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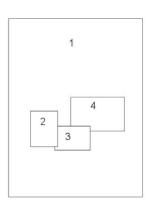
To enhance the quality of life for all citizens through the balanced stewardship of America's public lands and resources.

Our Mission

To sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.



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BLM File Photos:

- Stony Creek
 Ambler Scoping Meeting
 Kivalina Scoping
 Kiana Scoping Meeting

Scoping Report

for the

South National Petroleum Reserve-Alaska Integrated Activity Plan and Environmental Impact Statement

Prepared by
Alaska State Office
and
Arctic Field Office
Bureau of Land Management

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Scoping Report

South National Petroleum Reserve-Alaska Integrated Activity Plan and Environmental Impact Statement

I. Introduction

a.) Overview

The Bureau of Land Management (BLM) initiated the South National Petroleum Reserve-Alaska (NPR-A or Petroleum Reserve) Integrated Activity Plan and Environmental Impact Statement (IAP/EIS) to determine the appropriate multiple-use management of a 9.2-millionacre area within the NPR-A consistent with existing statutory direction. Specifically, the Naval Petroleum Reserves Production Act of 1976 (NPRPA), as amended, encourages oil and gas leasing in NPR-A while requiring protection of important surface resources and uses. Under the NPRPA, the Secretary of the Interior has the authority to conduct oil and gas leasing and development in the NPRA (42 US.C. § 6508). The NPRPA also provides that the Secretary of the Interior "shall assume all responsibilities" for "any activities related to the protection of environmental, fish and wildlife, and historical or scenic values" (42 U.S.C. § 6503(b)). In addition, the Secretary is authorized to "promulgate such rules and regulations as he deems necessary and appropriate for the protection of such values within the reserve" (42 US.C. § 6503(b)). Furthermore, the NPRPA, as amended, contains special provisions that apply to any exploration or development activities within areas "designated by the Secretary of the Interior containing any significant subsistence, recreational, fish and wildlife, or historical or scenic value" (42 U.S.C. §§ 6504(b), 6508). Two such areas: the Utukok Uplands Special Area and a portion of the Colville River Special Area are within the planning area. Any oil and gas exploration or development within a special area "shall be conducted in a manner which will assure the maximum protection of such surface resources to the extent consistent with the requirements of [the] Act for the exploration of the reserve" (42 U.S.C. §§ 6504(b), 6508). Finally, oil and gas activities must include or provide for "conditions, restrictions, and prohibitions as the Secretary deems necessary or appropriate to mitigate reasonably foreseeable and significantly adverse effects on the surface resources of the NPR-A" (42 U.S.C. § 6508(1)). This IAP/EIS will fulfill these statutory mandates.

b.) Purpose and Need for the Plan

Congress authorized "an expeditious program of competitive leasing of oil and gas" in the NPR-A in 1980 (P.L. 96-514, Dec. 12, 1980). Many leases sold by the BLM in 1982 were in the South NPR-A Planning Area, but those leases have now expired. Lands in the South NPR-A, while not closed to leasing, are currently unavailable for leasing because existing National Environmental Policy Act (NEPA) documentation is dated and no longer considered adequate. The current President's energy policy directs the Secretary of the Interior to "consider additional environmentally responsible oil and gas development, based on sound science and the best available technology, through further lease sales in the National Petroleum Reserve-Alaska."

The BLM is undertaking this IAP/EIS to fulfill the mandates of the president's energy policy and BLM's responsibilities to manage these lands under the authority of the Federal

Land Policy and Management Act (FLPMA) and of the NPRPA. This IAP/EIS will form the basic NEPA documentation to authorize leasing of the lands encompassed by the plan and will identify those areas that will be available and unavailable for leasing. In addressing BLM's responsibilities under NPRPA and FLPMA through a process required by NEPA, the public and government officials will have an opportunity to take a comprehensive look at the future management of the area, identifying options for and impacts of a range of management actions that BLM land planning guidance recommends be considered in land use plans. These management actions may include recommendations for designation of Wild and Scenic Rivers, desired population and habitat conditions, and/or management goals for various species, recreation opportunities, and cultural resources.

In addition, the BLM took the opportunity presented by scoping for this plan to learn whether there is interest in making part or all of the planning area available for hardrock or coal mining. It would require Congressional legislation to open these lands to such mining. BLM is continuing to evaluate whether it will include recommending legislation for opening the planning area, or parts of the planning area, to hardrock and/or coal mining as part of the scope of this plan. Unless and until determined to be outside the scope of the plan, the planning team will consider alternatives that recommend opening the planning area for hardrock and coal mining.

c.) Description of the Planning Area

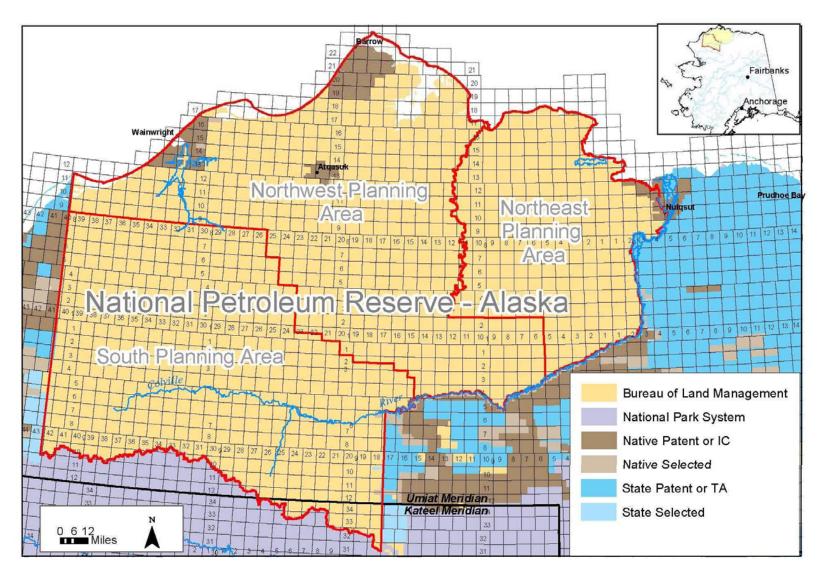
The planning area encompasses approximately 9.2 million acres of land located entirely within the National Petroleum Reserve-Alaska. (Map 1) The South NPR-A Planning Area is described as beginning at the Petroleum Reserve boundary on the township line between T. 8 N., R. 40 W. and T. 9 N., R. 39 W., Umiat Meridian (U.M.), and thence easterly along the township lines to the northeast corner of T. 8 N., R. 26 W., U.M., thence southerly and easterly along township and section lines in a stair-step fashion to the Petroleum Reserve boundary where the Colville River flows from T. 5 S., R. 15 W. to T. 4 S., R. 15 W., U.M., thence generally westerly, southerly, westerly, and northerly following the boundary of the Petroleum Reserve to the point of beginning.

d.) Description of the scoping process, meetings and contacts

Formal scoping began on June 15, 2005, with the publication in the *Federal Register* of a Notice of Intent (NOI) to prepare an Integrated Activity Plan and Environmental Impact Statement for the southern portion of the National Petroleum Reserve-Alaska (NPR-A) and a Call for Nominations related to oil and gas leasing. (Appendix A) The NOI asked the public for information on the South NPR-A planning effort specifically soliciting interest in opening the Petroleum Reserve to hardrock and coal mining (currently not allowed in the Petroleum Reserve). It also asked oil companies to identify areas within the planning area in which they were interested. Comments were due at the close of business on August 26, 2005.

A newsletter was also published in June 2005 announcing the beginning of the planning effort. It provided a description of the planning area, briefly described key resources, gave examples of decisions that might be made in the plan, and included the public meeting schedule and the address to submit written comments.

Prior to publication of the NOI on June 15th, BLM met with the Western Arctic Caribou Herd (WACH) Working Group to inform the group of BLM's intention to begin a planning effort for the South NPR-A. Early contact with the WACH working group was considered



Map 1. National Petroleum Reserve-Alaska: South NPR-A and other Planning Areas

important because the primary calving area of the WACH is located with the South NPR-A Planning Area. The WACH provides food for over 30 communities in northern and western Alaska with 15,000-20,000 caribou taken annually for subsistence within the herd's range (WACH Cooperative Management Plan, March 2003). The WACH Working Group agreed that visiting all villages that rely on the WACH for subsistence was impractical and assisted BLM in selecting appropriate locations for scoping meetings (see list below).

The purpose of each meeting was to: 1) introduce the public to the plan: the planning area, some of the area's key resources, types of decisions that might be made in the plan, anticipated issues or conflicts, the draft planning criteria, and the schedule; 2) answer questions that the public might have about the plan and the process; and 3) hear from the public as to their concerns/issues and any new information they felt was important or that we may have overlooked. Comments were recorded electronically and by note takers (usually two at each meeting).

Public turnout at the early scoping meetings was disappointing. In a letter dated July 11, 2005 (Appendix B) the WACH Working Group requested that the scoping period be extended to October 15, 2005. As a result, BLM decided to extend the scoping period and reschedule the remaining meetings. The Notice of Extension of the Public Scoping Period was published in the *Federal Register* on August 15th 2005. (Appendix C)

Scoping Meetings (in order of occurrence)

Location Location	Date	Public attendance
Kiana	July 18, 2005	8
Ambler	July 19, 2005	4
Kotzebue	July 20, 2005	7
Kivalina	July 21, 2005	16
Anchorage	August 16, 2005	16
Koyuk	August 22, 2005	9
Nome	August 23, 2005	8
Buckland	August 24, 2005	7
Point Hope	August 25, 2005	17
Nuiqsut	August 31, 2005	16
Fairbanks	September 1, 2005	10
Wainwright	September 12, 2005	20
Point Lay	September 13, 2005	15
Barrow	September 14, 2005	19
Atqasuk	September 15, 2005	29
Anaktuvuk Pass	September 16, 2005	11
Anchorage	September 20, 2005	3

Two hundred and fifteen individuals signed in at the 17 public meetings. A synthesis of the notes taken at each meeting is included as Appendix D.

e.) Cooperating Agencies/Invitees

The BLM invited the State of Alaska and the North Slope Borough to participate as cooperating agencies. The State of Alaska declined; however, the state will work closely with

the BLM. The North Slope Borough accepted and signed an agreement to be a cooperating agency on September 14, 2005.

f.) Collaboration and Consultation with Tribes

To initiate the government-to-government consultation process, on September 15, 2005, letters were sent to the following 44 tribal entities whose members could be affected by South NPR-A management actions. This initiated the government-to-government tribal consultation process.

Native Village of Barrow
Wainwright Traditional Council
Native Village of Wales
Native Village of Point Hope
Teller Traditional Council

Native Village of Nuiqsut
Native Village of Kivilina
Native Village of Kivilina
Chinik Eskimo Community
Native Village of Kotzebue
Noorvik Native Community
Native Village of Koyuk

Inupiat Community of the Arctic Slope
Point Lay Tribal Council

Native Village of Unalakeet
Kaltag Tribal Council

Native Village of Atqasuk
Naqsragmiut Tribal Council
Native Village Noatak

Koyukuk Native Village
Hughes Village Council
Organized Village of Grayling

Kiana Traditional Council
Native Village of Ambler
Native Village of Shungnak

Native Village of Buckland

Native Village of Shungnak

Selawik IRA Council

Native Village of Buckland

Native Village of St. Michael

Native Village of Shishmaref
Nulato Tribal Council
Native Village of Brevig Mission
Huslia Village Council
Native Village of Council
Allakaket Village

Nome Eskimo Community

Anakaket vinage

Louden Tribal Council

Elim IRA Council King Island Native Community
Kobuk Traditional Council Solomon Traditional Council

II. Issue Summary

a.) Summary of Public Comments

The following discussion provides an overview of the major themes in the comments received in writing or in the public meetings during the scoping period on the South NPR-A IAP/EIS. The most common comments were on:

- a.) management changes regarding oil and gas, hardrock mining, coal mining, Wild and Scenic Rivers, and Special Areas,
- b.) biological resources, particularly caribou, and
- c.) subsistence and social conditions.

Comments on these subject matters are discussed first below, followed by discussions of topics less frequently raised during scoping.

Oil and Gas—As in other NPR-A IAP/EISs, the public, agencies, and industry expressed a diversity of views on oil and gas development. Proponents of leasing, including the State of

Alaska and the Arctic Slope Regional Corporation, argued that the state and nation would benefit from such energy development. If gas is developed, there is interest that nearby communities, such as Atqasuk, have access to the gas. Opponents raised concerns that development would impact a wide array of the planning area's natural resources. Special concern was expressed for any oil and gas development in the Western Arctic Caribou Herd's calving and insect relief areas and in the Utukok Uplands and Colville River Special Areas. Both the North Slope Borough and the Western Arctic Caribou Herd Working Group opposed oil and gas development in these large areas within the planning area. There also was a diversity of opinion on whether BLM should rely on performance rather than prescriptive stipulations and required operating procedures.

Commenters also made a number of other points on oil and gas development in the plan area, including:

- new technologies will have to be developed, because some technology used on the North Slope's coastal plain will be inappropriate in South NPR-A,
- in order to promote development in this remote area, BLM should consider ways to improve access, including lengthening the winter operating window, development of permanent roads and/or staging areas, relaxed stipulations to allow gravel in moderate terrain, and tax/royalty relief, and
- if gravel roads are used for development, the access they would provide for the public to the area could have impacts on wildlife, subsistence, and cultural and archaeological resources.

Hardrock and Coal Mining—Discussion of including hardrock mining within the scope of the IAP/EIS elicited support, opposition, and questions. Supporters cited the potential economic benefits to the nation, the state, and to residents in the area who may obtain jobs in the mining industry. They cited the promise of the area for hardrock and coal; one prominent Alaskan coal mining company described the area as holding "the most significant coal deposit anywhere on the planet." Supporters also noted that the infrastructure—principally roads and port facilities—that mining would generate would also ease the way for energy development in the area. While some supporters of mining urged opening as soon as possible, other supporters argued that geophysical and geologic mapping for the entire NPR-A (commonly such recommendations came with a recommendation that the U.S. Geological Survey assist with this analysis) and the mapping should become the basis for subsequent planning.

Opponents expressed concerns with impacts to resources. As with oil and gas development, special concern was expressed for impacts to the caribou herd (especially if coal leasing was recommended in the calving area) and, through it, northwest Alaska residents' reliance on subsistence hunting. Some opponents cited environmental issues that have surfaced with the Red Dog mine development. They noted that such development, along with the westward expansion of oil and gas development along the Beaufort Sea coast raises concerns for indirect and cumulative impacts to marine life, including the migration paths of subsistence animals such as bowhead whales, through the potential for increased shipping. The National Park Service (NPS), which wrote that consideration of hardrock or coal mining was premature, stated a concern that road development associated with development in the South NPR-A could provide additional entry points for unauthorized OHV use into NPS-managed lands directly to the south of the planning area. The NPS believes this could in turn impact wildlife, subsistence, and cultural and archaeological values.

Discussion of hardrock and coal development also raised questions. There was considerable confusion how the plan could contemplate recommending such mining when the NPR-A is withdrawn by law from both activities.

Wild and Scenic River (W&SR) designation, general suggestions for adjustments to Special Area boundaries, and advocacy for protective management within the Special Areas. In addition, there were some comments urging other protective designations, such as wilderness designation. Most interest in W&SR designation focused on the Colville River, though the Utukok and other rivers were mentioned. Some commenters urged that the plan consider alterations to the boundaries of the Special Areas to provide greater protection for surface resources. As noted earlier, various commenters advocated that we exclude oil and gas and mining activities within the Special Areas. Other commenters, however, opposed the designation of Wild and Scenic Rivers. Although the ASRC supported designation of the Colville River as a W&SR as a means to protect habitat and resources, other North Slope residents were concerned that such a designation could bring in more outsiders, while restricting local subsistence users. The State of Alaska opposed W&SR designation and others advised that designations should not be allowed to exclude access or mineral development.

Biological Resources—Concerns about potential impacts to caribou are central to much of the concern regarding oil and gas, mineral, and coal development in the planning area. The Western Arctic Caribou Herd (WACH) calves in much of the planning area and much of the rest of the planning area is used by the herd for insect relief and migration. The Teshekpuk Lake herd uses the planning area in the winter. Some of the comments urged protection of the caribou by excluding development within the primary calving and insect relief areas. Concerns included impacts to the abundance and the distribution of the animals. Impacts mentioned included displacement at drilling and mining sites and by roads and other transportation facilities. There was concern that development would produce airborne and waterborne contaminants that would affect the caribou and that roads could make access easier for people outside the region, which in turn would affect caribou movements and distribution.

Impacts to birds, particularly raptors, were a concern of a number of commenters. They urged protection of nesting habitat along the Colville River and raptor habitat elsewhere in the planning area. Several letters expressed concerns regarding grizzly bears, wolverines, and wolves. Northwest Alaska residents expressed concern regarding any disturbance of rivers and the fish in them upon which they rely for food. Finally, there were comments indicating that, although the plan area is distant from the coast, development in the planning area could result in greater ocean traffic and possibly a port facility, both of which could cause impacts to marine life.

Subsistence and Social Conditions—There were concerns expressed that ocean shipping that may result from South NPR-A development could impact marine mammals upon which many northwest Alaska residents depend and that water pollution from development could impact subsistence river fisheries. But most concerns for subsistence were closely tied to concerns expressed regarding impacts to caribou. One Kivalina resident stated that the planning area's land used by caribou is "our dinner table." Concerns regarding impacts to subsistence extend far beyond the geographic limits of the planning area. Residents throughout the range of the

WACH expressed concern that their subsistence way of life would be impacted if the herd's population or migration was affected by development in the planning area. While those who supported development argued that development would provide jobs for local residents and help address some social problems in area villages, northwest Alaska commenters were concerned that they could be severely impacted if their subsistence was impaired, but would not necessarily benefit from any development. Residents stated that changes in distribution may require them to travel farther to get caribou and that extra travel would raise their fuel costs. Some commenters advocated the government provide compensation if development prevents villagers from getting enough caribou.

Other Resources—Scoping also yielded comments on several other resources:

- Air Quality—Comments expressed concerns that mining could impact air quality in and outside the planning area.
- Climate Change—Commenters urged that the plan consider both the potential impacts
 of development on climate change and climate changes' potential impact on how
 development, including shipping, may be carried out. The NPS was concerned that
 power generation as a result of development might generate air pollution affecting
 nearby park and preserves.
- Water Resources—Comments expressed concerns that mining could impact water quality in and outside the planning area.
- Cultural Resources—There were general concerns that development could impact cultural resources, including a former village site 60 to 70 miles up the Utukok River from the coast.
- Recreation—In addition to the opportunities for a wildland recreation experience that could be afforded through protection of lands and designations such as those for W&SRs, there was a request that BLM include "quality wilderness hunting opportunities [in] any final plans."

b.) Issues and management concerns identified during scoping

Four issue topics and several management concerns were identified by the BLM prior to scoping. Comments made during the scoping period affirmed these as the major issues and concerns.

Management Issues

Issues are matters of controversy or dispute related to resource management activities or land use. Usually, the causal relationship between the activity or use and undesirable effects are well defined, can be documented and the level of controversy is high enough to merit further analysis. Planning issues orient the planning process so that the focus of the thought, analysis, and documentation is directed towards resolution of the issues during the planning process. Planning issues will lead to more than one alternative as different entities with different values have differing views as to how the conflicts should be resolved.

<u>Issue Topic 1:</u> Oil and gas exploration and development and the potential impacts on important surface resources and subsistence activities.

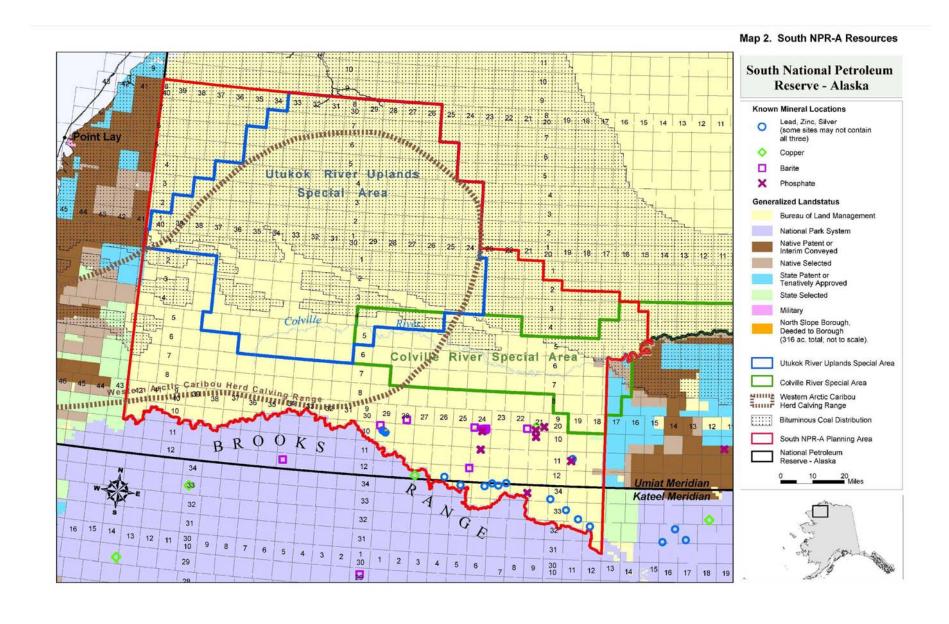
The South NPR-A Planning Area does not have oil resources equivalent to those estimated to occur in other parts of the NPR-A, but natural gas potential is relatively high.

At present, all gas resources on the North Slope are stranded because of the lack of a transportation system to outside markets. However, natural gas development is of interest to industry and discussions are under way at both the federal and state levels to develop a pipeline to bring North Slope gas to market. Also, natural gas production for local energy uses (villages) could be a viable commercial enterprise in the future. Accordingly, as in previous NPR-A planning efforts, identifying which lands will be available or unavailable to oil and gas leasing will be of great interest to the public and the decision may be controversial. This is especially true because the South NPR-A Planning Area is a relatively pristine area with approximately 56 percent of the area in Special Area status (Utukok River Uplands and Colville River Special Areas). Describing the intent of the Special Area status, the NPRPA of 1976 states that, "special precautions may be necessary to control activities which would disrupt the surface values or disturb the associated fish and wildlife habitat values and related subsistence requirements of Alaska Natives." The Act also states that "while maximum protection of surface values is not a prohibition of exploration-related activities within such areas, it is intended that such exploration operations will be conducted in a manner which will minimize the adverse impact to the environment." A reasonable range of alternatives would allow access to industry while providing for adequate protection of important surface and subsistence resources.

<u>Issue Topic 2:</u> Hardrock development and potential impacts on important surface resources and subsistence activities.

The Petroleum Reserve was closed to mineral leasing as part of the creation of Pet-4 in 1923. This intent was reinforced by Sec. 102 of the Naval Petroleum Reserves Production Act of 1976 (42 U.S.C. Sec 6502) that withdrew the area from all forms of entry and disposition under the public land laws, including the mining and mineral leasing laws. However, the southern NPR-A contains known occurrences of phosphate rock, metalliferous oil shale, zinc, lead, silver, barite, copper, and fluorite and nearby areas hold chromium and platinum group elements. (Map 2) Occurrences of uranium could also be expected in this geologic environment. The world-class Red Dog deposit is located forty miles southwest of the planning area boundary. Red Dog is currently the world's largest producer of zinc concentrate with byproducts of lead and silver. Rocks of equivalent composition and age extend into the planning area where they exhibit similar mineralization. The Drenchwater occurrence, located 95 miles northwest of Red Dog and within the planning area, has the potential to contain resources of zinc, lead, and silver. There are also seven barite occurrences within the southern portion of the planning area. Sampling shows several of these to be of marketable grade (specific gravity greater than 4.2) and shallow enough to be amenable to surface mining. Indicated resources total 54 million tons. Several companies have expressed interest in these deposits as a source of additive for North Slope drilling operations. Occurrences of phosphate rock, with an indicated resource totaling 15.7 million tons, occur to the east of the planning area. These phosphate-bearing rocks are thought to extend west across much of the southern portion of the planning area.

Given the planning area's identified mineral potential there is an understandable interest in seeing portions of the planning area open to exploration and development of hardrock deposits. As with oil and gas development, activities associated with hardrock



exploration and development could adversely impact surface resources and conflict with subsistence and recreational activities. In this relatively pristine area, decisions related to mining activities will receive considerable public attention. If the scope of the plan includes hardrock mining, alternatives will have to provide a reasonable range of options that weigh the benefits of mining activities with the potentially adverse effects to surface and subsistence resources.

<u>Issue topic 3:</u> Coal mining and potential impacts on important surface resources and subsistence activities

The Petroleum Reserve was closed to mineral leasing as part of the creation of Pet-4 in 1923. This intent was reinforced by Sec. 102 of the Naval Petroleum Reserves Production Act of 1976 (42 U.S.C. Sec 6502) that withdrew the area from all forms of entry and disposition under the public land laws, including the mining and mineral leasing laws. Yet, Alaska's North Slope contains coal-bearing strata that underlie approximately 58,000 square miles. Marritt and Hawley (1986) identify coal resources totaling 150 billion tons, with possible (unmapped) coal resources of about 4 trillion tons. Coal ranges from subbituminous to bituminous in quality. These deposits, largely in NPR-A (Map 2), represent one-third of the nation's estimated coal endowment. Most of the coal resources occur in the Nanushuk Group (Cretaceous), and aggregate thickness of coal seams in this stratigraphic unit total greater than 300 feet thick. The Nanushuk coal deposits are identified in the northern portion of the South NPR-A Planning Area.

Because of the vastness of the area's coal resources it is not surprising that there is interest in seeing portions of the planning area open to coal leasing. As with other mineral development, activities associated with coal development could adversely impact surface resources and conflict with subsistence and recreational activities. In this relatively pristine area, decisions related to coal leasing activities will receive considerable public attention. If the scope of the plan includes coal mining, alternatives would provide a reasonable range of options that weigh the benefits of mining activities with the potentially adverse effects to surface and subsistence resources.

<u>Issue Topic 4:</u> Wild and Scenic River designation and the potential impediment to development and subsistence activities

The federal government has been directed by Congress to consider potential additions to the national Wild and Scenic Rivers system during land use planning. To be eligible, a river must be free-flowing (without dams) and contain at least one outstanding resource value. All rivers in the South NPR-A Planning Area are free-flowing. The value criteria could include scenic, recreational, geologic, fish and wildlife, historic, cultural, or other remarkable values. The two major river systems in the planning area, the Colville and the Utukok, are known to possess outstanding scenic, cultural, and wildlife values including caribou, grizzly bear and populations of cliff-dwelling raptors (peregrine falcon, gyrfalcon, rough-legged hawk, and golden eagle). Section 604 of ANILCA designated these two rivers for study and stated that the studies prepared and transmitted pursuant to section 105(c) of the NPRPA would satisfy the study requirements. The 105(c) study

recommended that those segments of both rivers within the planning area were suitable for inclusion as "wild rivers" in the Wild and Scenic River System. Although Congress did not act on those recommendations, little has changed and both rivers still possess "outstandingly remarkable river values" and are eligible

The South IAP/EIS will decide on the suitability or non-suitability of the Utukok, Colville, and other eligible rivers within the planning area as additions to the national Wild and Scenic Rivers system. Rivers that are found suitable may be recommended for designation by Congress. In contrast to eligibility, which is based on a factual description of the existing situation, suitability is a decision based on weighing various elements through the planning process. The decision on suitability will be made after answering the following questions:

- 1. Should the river's character, water quality, and other values be maintained in its present condition, or can regulated multiple-use activities be allowed without adversely affecting these qualities?
- 2. Would Wild and Scenic River designation be the best method for protecting the river corridor? Is there a commitment by all potentially affected parties to maintain the present qualities of the river, and will non-federal organizations cooperate in implementing the new management plan?

During the scoping period there was concern expressed that WSR designations would be an impediment to both development and subsistence activities. There was also support that such designation was the best way to protect important river values. During development of the plan, we will need to formulate a range of alternatives that balance the need to protect river-dependent values with the opportunity to pursue subsistence activities and to develop the area's mineral resources.

Management Concerns

The following significant, sensitive, or unique resources are present within the South NPR-A Planning Area and were identified by BLM staff prior to scoping as being present. Most of these resources were also identified during scoping as being potentially at risk if mineral development were to occur. In large part it is due to the potential for significant impacts to these resources that energy and mineral development proposals are so controversial. Consequently, the EIS must consider impacts to these resources resulting from anticipated management activities, develop appropriate mitigation, and identify objectives (e.g., desired population and habitat conditions) and actions (e.g., use restrictions) needed to achieve or maintain those objectives.

1. Of particular importance, the Western Arctic Caribou Herd (WACH) calving grounds are located within the planning area. (Map 2) Calving (May – June) is one of the most sensitive periods of the year for caribou. Later in the summer, during insect season, the WACH uses much of planning area for insect relief. This is an important period for caribou when they attempt to both avoid insects and garner energy resources through foraging with significant implications for the ability of females to conceive during the fall rut. Caribou are particularly vulnerable to disturbance during this time. Any activity that could potentially impact this critically important subsistence resource will be controversial. This herd feeds dozens of villages in the northwest quarter of Alaska. Annually, 15,000 – 20,000 Western Arctic Caribou are taken for subsistence within the herd's range (WACH Cooperative Management Plan, March 2003).

- 2. Important habitat for cliff-nesting raptors, including peregrine falcon, gyrfalcon, rough-legged hawk, and golden eagles is found throughout the South NPR-A Planning Area. Although none of these species are currently afforded any protection by the Endangered Species Act, they are high profile and any management actions that would impact their populations would be very controversial.
- 3. Populations of buff-breasted sandpiper nest in the planning area and are on BLM's sensitive species list. As such, BLM must manage the species to prevent future listing under the Endangered Species Act.
- 4. There is a much greater presence of Pacific salmon in the South NPR-A (in the rivers flowing west), and these are targeted by local citizens for subsistence. This will require a close look at how land activities may impact fisheries because of the statewide sensitivity to impacts to salmon-bearing waters.
- 5. Associated with the large number of the caribou in the South NPR-A Planning Area, is the highest density of grizzly bears and wolverines anywhere in the Petroleum Reserve. Human developments in grizzly bear habitat must be carefully managed to avoid conflicts.
- 6. Recreational opportunities are considered to be greater and more diverse, as compared to other areas in the Petroleum Reserve. Most of this use (hunting, fishing, hiking, photography) occurs along major rivers, primarily the Utukok and the Colville (and its tributaries) where access is provided by boat or aircraft using gravel bars as airstrips. This means that not only will there be a concern to protect recreation and visual resources along these rivers but also a concern to prevent adverse impacts to surface resources and subsistence activities resulting from recreation activities.
- 7. Impacts to fish habitat (e.g. spawning habitat) in the upper Colville may have important impacts on lower Colville fisheries.
- 8. Native residents of the North Slope have voiced concern over the identification and protection of cultural resources, both historic and prehistoric. Specific concerns have been expressed about graves/burial locations of ancestors and areas utilized for seasonal camps by ancestors, as well as archaeological sites in general. This concern is a persistent theme expressed by North Slope Alaskan Natives who are very proud of and concerned about the physical remains of their cultural heritage. They are strong advocates of a vigorous proactive approach to identification and protection of such sites by BLM.

c.) Anticipated decisions to be made

This section describes the types of decisions expected to be made through the planning process either to address management issues and concerns identified during scoping or to address general BLM management objectives:

Natural, Biological and Cultural Resources

- **Air**: Identify desired outcomes and area-wide restrictions that apply to authorized emission generated activities
- Soil and Water: Identify watersheds or specific soils that may need special protection from the standpoint of human health concerns, ecosystem health, or other public uses. For riparian areas, identify desired width/depth ratios, stream bank conditions, channel substrate conditions, and large woody characteristics. Identify area-wide use

- restrictions or other protective measures to meet state and local water quality requirements.
- Vegetation: Identify desired outcomes for vegetative resources, including the desired mix of vegetative types, structural stages, and landscape and riparian functions; and provide for native plant, fish, and wildlife habitats. Goals and objectives may be established at multiple scales. Identify areas of ecological importance and designate priority plant species and habitats. Identify the actions and area-wide use restrictions needed to achieve desired vegetative conditions.
- **Special Status Species**: Identify desired outcomes, strategies, restoration opportunities, use restrictions, and management actions to conserve and recover special status species. Goals and objectives may be species or habitat specific and can be established at multiple scales.
- **Fish and Wildlife**: Designate priority species and habitats for fish or wildlife species recognized as significant for at least one factor such as public interest, density, etc. Describe desired habitat conditions and/or population for major habitat types that support a wide variety of game, non-game, and migratory bird species. Identify actions and area-wide use restrictions needed to achieve desired population and habitat conditions.
- Cultural Resources: Identify restrictions to protect cultural resources that may affect the location, timing, or method of development or use of other resources in the planning area. Identify area-wide criteria for recognizing potential cultural resource conflicts such as geographic characteristics of sacred sites or cultural landscapes (springs, ridges, peaks, caves and rock shelters for example). Consider these restrictions and criteria in all proposed land and resource use decisions.
- Paleontology: Identify criteria or use restrictions to ensure that (1) areas containing or likely to contain vertebrate or noteworthy occurrences of invertebrate or plant fossils are identified and evaluated prior to authorizing surface-disturbing activities; (2) management recommendations are developed to promote the scientific, educational, and recreational uses of fossils; and (3) threats to paleontological resources are identified and mitigated as appropriate.
- **Visual Resources**: Designate Visual Resource Management (VRM) management objectives (classes) based on an inventory of visual resources and management considerations for other land uses. Manage visual resources and other resource uses and management activities consistent with established objectives.
- Wildland Fire Management: Identify landscape level fire management goals and objectives; identify allowable uses and management actions to achieve the fire management goals and objectives.
- Wilderness Characteristics: Identify decisions to protect or preserve wilderness characteristics (naturalness, outstanding opportunities for solitude and outstanding opportunities for primitive and unconfined recreation). For authorized activities include conditions that would avoid or minimize impacts to wilderness characteristics.

Resource Uses

• Recreation and Visitor Services: Identify special recreation management areas (SRMA's) and for each SRMA delineate appropriate recreation management zones. For each zone identify the recreation niche to be served, write explicit management

- objectives, prescribe the setting character required to produce recreation opportunities and facilitate the attainment of recreation experiences and beneficial outcomes as targeted, and briefly describe an activity planning framework. VRM management classes need to be correlated with recreation management objectives.
- Comprehensive Trails and Travel Management: Delineate travel management areas (polygons) and identify acceptable modes of access and travel for each area. Consider all resource use aspects such as recreational, traditional, casual, agricultural, commercial, and educational. Also, designate OHV management areas. All public lands are required (43 CFR 8342.1) to have off-highway vehicle designations; areas must be classified as open, limited, or closed to motorized travel activities.
- Lands and Realty: Identify consistent with the goals and objectives for natural resources in the area (1) proposed withdrawal areas including existing withdrawals to be continued, modified, or revoked, (2) where and under what circumstances authorizations for use occupancy and development (such as major leases and permits) may be granted, (3) existing and potential development areas for renewable energy projects (e.g., wind and solar) communication sites and other uses, (4) ROW exclusion areas and (5) terms and conditions that may apply to ROW corridors and development areas including best management practices to minimize environmental impacts and to limitations on other uses necessary to maintain the ROW corridor and ROW values.
- Coal: If included in the scope of the plan, identify what lands to recommend to Congress as suitable for leasing or unsuitable for all or certain types of coal mining operations.
- Oil Shale: see fluid minerals.
- Fluid Minerals: Identify (1) areas open to leasing subject to existing laws, regulations, and formal orders; and the terms and conditions of the standard lease form, (2) areas open to leasing subject to moderate constraints, (3) areas open to leasing, subject to major constraints such as NSO's more than 40 acres in size and 0.25 mile in width, (4) areas to be closed, (5) resource condition objectives and specific lease stipulations to accomplish stated objectives in areas open to leasing, (6) for each stipulation the circumstance for granting an exception, waiver, or modification, (7) whether leasing and development decisions apply to geophysical exploration, and (8) long-term resource condition objectives for areas under development to guide reclamation activities prior to abandonment.
- **Hardrock Minerals**: If included in the scope of the plan, identify areas to be recommended to Congress be opened up to mineral development and any terms and conditions or other special considerations needed to protect other resource values while conducting mining activities. (Note: Hardrock includes both locatable and nonenergy leaseables.)
- Mineral Materials: Identify areas to be open or closed for mineral material disposal and any terms, conditions or other special considerations needed to protect other resource values while operating under the mineral material regulations.

Special Designations

• Administrative Designations: assess all eligible river segments and determine which are suitable or non-suitable per Section 5(d)(1) of the Wild and Scenic Rivers Act and any modifications or additions to the Special Areas in the plan area.

Support

- Cadastral: Identify areas where additional survey work is needed to locate and mark boundaries on the ground.
- Transportation Facilities: Identify areas available or suitable for transportation facilities and limitations, if any, on the types or locations of facilities for specified areas. Identify the area(s) having in-place transportation facilities that should be removed.

d.) Issues raised that will not be addressed in this process

Many comments received during the scoping period concerned issues outside BLM's management authority or addressed concerns that BLM, in developing the planning criteria, have determined to be outside the scope of the plan. Issues raised that will not be addressed as parts of alternatives in the plan are:

- Proposals to consider legislative designation of wilderness areas in NPR-A—Pursuant
 to authority granted to the Secretary of the Interior in the Alaska National Interest
 Lands Conservation Act, the Secretary on April 11, 2003 established as policy that
 absent "broad support among the State and Federal elected officials representing
 Alaska" for wilderness studies, no such studies will be conducted for Alaska lands.
 There has been no indication of such support for wilderness studies in the planning
 area, so wilderness recommendations will not be considered in this plan.
- Proposals that would require industry to hire locally—BLM has no authority to require that industry hire locally and local hire is not within the scope of the purpose and need of the plan. Local hire may be discussed as a mitigation measure, though one that would rely upon industry to fulfill.
- Proposals to modify the manner in which "impact funds" are distributed—Distributing
 or determining the distribution of "impact funds" is not within the scope of the
 purpose and need of the plan. Moreover, BLM has no legal authority to disperse
 "impact funds." Nor does it have authority to direct how the State of Alaska disperses
 funds in its NPR-A Special Revenue Fund, though the plan would discuss these funds
 and their role in mitigating impacts.
- Proposals to provide natural gas to North Slope communities—Determining
 distribution of natural gas is not within the scope of the purpose and need of this plan,
 BLM has no legal authority to require industry to provide natural gas to local
 communities, and no communities exist within the planning boundary. Providing
 nearby communities with natural gas may be discussed as a mitigation measure,
 though as one that would rely upon industry to fulfill.

e.) Valid existing management to be carried forward

As authorized by the NPRPA, BLM will continue to regulate the development of the Petroleum Reserve in a manner consistent with the total energy needs of the Nation and as necessary and appropriate to protect environmental, fish and wildlife, and historical or scenic values.

f.) Special Designation Nominations

Although there was some support for BLM to consider wilderness designation(s) for portions of the South NPR-A Planning Area, BLM did not receive any request from state or

federal elected officials representing Alaska to conduct a wilderness review as part of this planning effort. Consistent with current policy, lacking such support, BLM will not conduct a wilderness review as part of this planning process.

During the scoping process several rivers were recommended for consideration for inclusion in the National Wild and Scenic Rivers System. As directed by Congress this plan will determine the suitability or non-suitability of eligible rivers within the planning area for nomination as potential additions to the National Wild and Scenic River System. Rivers found suitable may be forwarded to Congress as recommended for designation. The BLM will also identify alternative strategies for the protection of river-dependent values.

There is no authority to create ACEC's in the NPR-A, however, under the NPRPA, there is authority to create Special Areas. Two such areas currently exist in the planning area: the Utukok River Uplands Special Area and the Colville River Special Area. Several commentors requested a review of the Special Area boundaries noting that the current boundaries and purpose was too limited to protect key resources.

III. Draft Planning Criteria

The Bureau of Land Management prepares planning criteria to guide development of land use plans. Planning criteria are the constraints or ground rules that guide and direct the development of the plan and determine how the planning team approaches the development of alternatives and, ultimately, selection of a preferred alternative. They ensure that plans are tailored to the identified issues and ensure that unnecessary data collection and analyses are avoided. Planning criteria are based on standards prescribed by applicable laws, regulations, and agency guidance; the result of consultation and coordination with the public, other federal, state and local agencies, governmental and Tribal entities, and Native Corporations; the analysis of information pertinent to the planning area, and professional judgment.

Preliminary criteria developed internally (reference Preplan Analysis for the South NPR-A IAP/EIS September 2004) were presented to the public during scoping. Many comments were received during the scoping period relevant to the planning criteria. Most of these comments related to the scope of the plan or range of alternatives and were voiced as opinions or concerns about proposals to consider hardrock and coal development in the range of alternatives; such development is not allowed under the NPRPA. After consideration of the comments and information received during the scoping period, the following criteria are approved:

General Planning Criteria

- Opportunities for public participation will be encouraged throughout the IAP/EIS process.
- Valid existing rights will be recognized and protected.
- BLM will meet the requirements in Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA) and consider subsistence uses and needs and minimize adverse impacts to the extent possible.
- In addition to carrying out its obligations pursuant to regulations (e.g., Endangered Species Act, Sec. 7), to Executive Order 13175 for tribal consultation, and to its Memorandum of Understanding with the North Slope Borough (a cooperating

- agency), BLM will also collaborate with other interested groups in this planning process.
- Wildlife habitat management will be consistent, to the extent compatible with BLM's responsibility under the NPRPA, with Alaska Department of Fish and Game (ADFG) objectives and/or the Federal Subsistence Board requirements or mandates.
- The plan will be consistent with the mandates of the NPRPA, applicable sections of FLPMA (sections 202 and 603 are not applicable, ref. Appropriations Act of Dec 12, 1980), National Environmental Policy Act, Council on Environmental Quality directives, National Historic Preservation Act, the Wild and Scenic Rivers Act, and other federal laws, regulations, and policies as required.
- The plan will address all lands within the planning area that are currently administered by BLM.
- Land health standards for watershed functions; ecological processes; water quality and yield; and threatened, endangered, native, and locally important species established by IM AK 2004-023 will be used as criteria in this planning effort.
- NPR-A is exempt from the planning requirements of section 202 of FLPMA (ref. the Appropriations Act of Dec 12, 1980, PL 96-514), but to the extent practical the Bureau's planning process, as outlined in BLM handbook H-1601-1, will be followed.

Criteria for Formulation of Alternatives and Development of Management Direction

- The action alternatives will provide opportunities for successful oil and gas operations while minimizing adverse effects to other resources. Exploration and development scenarios will be analyzed in sufficient detail to serve as a leasing EIS for multiple leases.
- If hardrock and coal mining are determined to be within the scope of the plan, the South NPR-A IAP/EIS will include a range of alternatives that include hardrock mineral development and coal leasing. A recommendation adopted by BLM regarding hardrock mineral development and coal leasing developed through the planning process will be forwarded to Congress through the Secretary for legislative action.
- Any action alternatives that recommend making lands within the planning area available for hardrock exploration and development will do so assuming that such activities would be regulated either under the mining law of 1872 or under a leasing program similar to that outlined in 43 CFR Part 3500. Any coal mine development would be assumed to occur under a leasing program. Such leasing programs in the Petroleum Reserve currently are not allowed [43CFR 3503.11 (d)].
- BLM will not do a wilderness review as part of this planning process; current policy is that such a review will be conducted only if there is support from state or federal elected officials representing Alaska; no such support was received.
- The alternatives will consider eligible rivers within the planning area for inclusion in the Wild and Scenic River system.
- The Draft Plan will have a reasonable range of alternatives.
- The action alternatives will provide goals, management objectives, actions, and desired outcomes addressing key resources and areas along the Colville River. This general management direction will set the sideboards and provide a framework for development of an activity-level management plan, the Colville River Management Plan (CRMP), addressing day—to-day management issues along the Colville River.

- The CRMP will identify actions necessary to implement management direction contained in the South, as well as the amended Northeast and the Northwest, National Petroleum Reserve-Alaska IAP/EIS's relating to the Colville River.
- Action alternatives will identify a range of reasonable combinations of resource uses, management practices, and resource protections that are responsive to the planning issues identified in Section II of this report.
- In addition to the planning issues identified in Section II of this report, the alternatives will address, to the extent practicable, the program- and resource-specific land use plan decisions identified in Appendix C of the BLM Land Use Planning Handbook H-1601-1. The alternatives will not address program- and resource-specific land use plan decisions identified under the following headings in Appendix C:
 - A. Natural, biological and Cultural Resources

Wild Horse and Burros

Cave and Karst Resources

B. Resource Uses

Forestry

Livestock Grazing

Lands and Realty: identification of lands for disposal and acquisition.

Fluid minerals: tar sands, geothermal resources

C. Special Designations

Congressional Designations

Administrative Designations – Wilderness Study Areas, ACECs.

IV. Summary of Future Steps in the Planning Process

Describe the Affected Environment: BLM's team of resource specialists will describe the existing environment in the planning area. This work began in late 2005.

Formulation of Alternatives: Alternatives will be formulated by identifying a range of resource objectives and management practices that will address issues. The range of alternatives will include a no action alternative and a preferred alternative. Alternative formulation will begin for the South NPR-A IAP/EIS in early 2006.

Analysis of Effects: Once the alternatives are developed, the effects of each alternative on the human environment will be analyzed using the NEPA process. BLM expects to begin this process in 2007.

Publish the Draft RMP/EIS: This step will begin with the release of the draft IAP/EIS for a 45- to 90-day public review period that will include public meetings. A Notice of Availability (NOA) will be published in the *Federal Register* in the summer of 2008. The public comment period will extend for 90 days after publication of the NOA.

Issue the Proposed Final IAP/EIS: Based on the information contained in the draft IAP/EIS, public comment received, and additional analysis, BLM will select a final management plan and present it to the public as the Final IAP/EIS. This step will include public notice of the document's availability and the distribution of the document. BLM will begin this step in the fall of 2009.

Issue the Record of Decision (ROD): Following a 30-day review period of the South NPR-A Final IAP/EIS, BLM will issue its decision. This decision is scheduled for late 2009.

After the ROD: Additional management actions will be required after issuance of the ROD. For example, changes in the boundaries of the Special Areas would require action by the Secretary of the Interior, and establishment of a Wild and Scenic River or opening of areas to hardrock and/or coal mining would require Congressional action.

If the ROD makes lands available for oil and gas leasing, the first sale could occur in 2010. Additional work will be done after any lease sale to determine the acceptability of bids.

Although for analysis purposes, the IAP/EIS will assume that all lands that the ROD determines should be available for oil and gas leasing will be offered in the first sale, in fact, the first sale may offer only part of the lands determined to be available in the ROD. Subsequent oil and gas lease sales could offer additional available tracts for leasing as well as re-offer tracts not leased earlier. The area offered, however, would be within the area identified in the ROD as available for leasing. The timing of the second and subsequent sales, if any, will depend in part on the response to the first sale and the results of the exploration that follows. The BLM anticipates that this IAP/EIS will fulfill the NEPA requirements for the first sale. Prior to conducting each additional sale, the agency will conduct a NEPA analysis, tiering from the IAP/EIS. If the analysis in the IAP/EIS is deemed to be adequate, the NEPA analysis for any second or subsequent sale may require only a determination of NEPA adequacy or an EA to support the ROD. If parts of the planning area are leased as one outcome of the IAP/EIS, additional NEPA analysis will also be conducted at both the exploration and development stages during the permitting process.

Appendices

Appendix A: Notice of Intent to Prepare the South National Petroleum Reserve-Alaska Integrated Activity Plan/Environmental Impact Statement, Request for Information, Call for Nominations and Comments, and Solicitation of Interest in Hardrock and Coal Mining

Appendix B: Western Arctic Caribou Herd Working Group to Henri Bisson, July 11, 2005

Appendix C: Notice of Extension of the Public Scoping Period for the South National Petroleum Reserve-Alaska Integrated Activity Plan/Environmental Impact Statement and Request for Information, Call for Nominations and Comments, and Solicitation of Interest in Hardrock and Coal Mining

Appendix D: Scoping Meeting Comments

DEPARTMENT OF THE INTERIOR

Bureau of Land Management [AK-020-1610-DO]

Notice of Intent To Prepare the South National Petroleum Reserve-Alaska Integrated Activity Plan and To Prepare an Accompanying Environmental Impact Statement, Request for Information, Call for Nominations and Comments, and Solicitation of Interest in Hardrock and Coal Mining

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of intent.

SUMMARY: The Bureau of Land
Management (BLM), Alaska State Office,
is preparing an Integrated Activity Plan
(IAP) for the South portion of the
National Petroleum Reserve-Alaska
(NPR-A) and an accompanying
Environmental Impact Statement (EIS).
This Notice initiates the public scoping
process and a Call for Nominations
related to oil and gas leasing. It also
requests public input on hardrock and
coal mining.

DATES: Scoping comments can be submitted in writing to the address listed below and will be accepted until August 26, 2005. Scoping meetings will be held in northwestern Alaska, Anchorage and Fairbanks. All public meetings will be announced through the local news media and a mailing. Responses to the Call for Nominations related to oil and gas leasing are also due no later than August 26, 2005.

ADDRESSES: Scoping comments should be submitted to: South NPR—A Planning Team Leader, 222 West 7th Avenue, #13, Anchorage, Alaska 99513—7599.

Responses to the Call for Nominations must be submitted in envelopes labeled "Nominations Related to the South NPR-A IAP/EIS" to protect the confidentiality of the nominations. They are to be addressed to: Call for Nominations, South NPR-A Team, 222 West 7th Avenue, #13, Anchorage, Alaska 99513-7599.

FOR FURTHER INFORMATION CONTACT: Jim Ducker (907–271–3130) or Susan Childs (907–271–1985) by phone or by mail at 222 W. 7th Avenue, #13, Anchorage, AK 99513–7599.

SUPPLEMENTARY INFORMATION: The BLM published a Record of Decision (ROD) October 7, 1998, for the Northeast National Petroleum Reserve-Alaska Integrated Activity Plan/Environmental Impact Statement. An amendment to that plan is in progress; a Final EIS for the amendment was issued January 28, 2005. On January 22, 2004 BLM

published a ROD for the Northwest National Petroleum Reserve-Alaska Integrated Activity Plan/Environmental Impact Statement. The South National Petroleum Reserve-Alaska Integrated Activity Plan/Environmental Impact Statement (South IAP/EIS) will complete planning for the Petroleum Reserve, the largest contiguous land under BLM management.

The objectives of the South IAP/EIS

are three-fold:

1. To examine what, if any, lands are appropriate to be made available for oil and gas leasing and to identify the performance-based mitigations that should be adopted to protect resources if oil and gas leasing is authorized.

2. Identify options for and impacts of

 Identify options for and impacts of a range of management actions that BLM land planning guidance recommends be considered in land use plans, including recommendations for designation of

Wild and Scenic Rivers.

3. Identify options for and impacts of a range of management actions relevant to certain resources and land uses of particular concern either to the public or to BLM. These include the desired population and habitat conditions, and/or management goals and actions appropriate to achieve these goals for various species (including cliff-dwelling raptors, buff-breasted sandpipers, Pacific salmon, fish habitat, grizzly bears, wolverines), recreation opportunities, and cultural resources. Additional topics may be developed through the public scoping.

In addition, the BLM is taking this

opportunity to learn whether there is interest in making part or all of the planning area available for hard rock or coal mining. It would require Congressional legislation to open these lands to such mining. The South IAP/EIS may analyze alternatives that would contemplate recommendations for

opening.

During the course of development of the South IAP/EIS, BLM will also develop a river management plan for the Colville River. These plans will be developed in tandem and the Colville River Management Plan will tier off both the management decision developed through the South IAP/EIS and the Records of Decision for the Northeast and Northwest portions of the Petroleum Reserve.

Petroleum Reserve.

The purpose of this notice is to seek comment on the South IAP/EIS and to call for nomination of areas to be considered for oil and gas leasing. Information and comments on specific issues to be addressed in the plan are sought from all interested parties. This early planning and consultation step is important for ensuring that all interests

and concerns are communicated to the BLM Northern Field Office manager for decisions in land use, planning, and management.

The South planning area is described as beginning on the Petroleum Reserve boundary on the township line between T. 8 N., R. 40 W. and T. 9 N., R. 39 W., Umiat Meridian (U.M.), and thence easterly along the township lines to the northeast corner of T. 8 N., R. 26 W., U.M., thence southerly and easterly along township and section lines in a stair-step fashion to the Petroleum Reserve boundary where the Colville River flows from T. 5 S., R. 15 W. to T. 4 S., R. 15 W., U.M., thence generally westerly, southerly, westerly, and northerly following the boundary of the Petroleum Reserve to the point of beginning. This area consists of approximately 9.2 million acres. A map of the plan area (which also serves as the Call map) showing boundaries of the area on a township-by-township basis is available at BLM's Information Center in the Anchorage Federal Office Building, 222 West 7th Avenue, Anchorage, (907-271-5960).

Call for Nominations: Pursuant to 43 CFR 3131.1 and 3131.2, relevant information related to possible oil and gas leasing is requested for the plan area. Oil and gas companies are specifically requested to nominate areas within the plan area that they would like to have considered for oil and gas leasing. Nominations must be depicted on a Call map by outlining the area(s) of interest along township lines. Nominators are asked to submit a list of townships nominated to facilitate correct interpretation of the Call map. Although the identities of those submitting nominations for oil and gas leasing become a matter of public record, the individual nominations will be held confidential.

Nominators also are requested to rank townships nominated for oil and gas leasing according to priority of interest (e.g., high priority 1, medium priority 2, or low priority 3). Townships nominated that do not indicate priorities will be considered priority 3. Blanket priorities on large areas are not useful in the analysis of industry interest. The telephone number and name of a person to contact in the nominator's organization for additional information should be included in the response.

Although nominations are to be submitted along township lines, comments are also being sought on the preferred size of tracts for leasing in this area, not to exceed 60,000 acres. 43 CFR 3130.4—1 limits the size of an oil and gas lease tract within the NPR-A boundaries to no more than 60,000 acres.

Authority: Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.), as amended; the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.), as amended; Title I of the Naval Petroleum Reserves Production Act of 1976 (42 U.S.C. 6501 et seq.), as amended by the Department of the Interior and Related Agencies Appropriations Act for Fiscal Year 1981, Pub. L. 96–514, 94 Stat. 2957, 2964 (codified in 42 U.S.C. 6508); the Alaska National Interest Lands Conservation Act, Pub. L. 96–487, 94 Stat. 2371, section 810, 16 U.S.C. 3120; and the regulations at 43 CFR parts 2360 and 3130.

Henri R. Bisson,

State Director.

[FR Doc. 05-11773 Filed 6-14-05; 8:45 am]

Appendix B

Western Arctic Caribou Herd Working Group

Goal: To work together to ensure the long-term conservation of the Western Arctic Caribou Herd and the ecosystem on which it depends, to maintain traditional and other uses for the benefit of all people now and in the future.

Chair: Raymond Stoney Vice-Chair: Roy Ashenfelter

July 11, 2005

Mr. Henri Bisson Alaska State Director Bureau of Land Management 222 W. 7th Ave, #13 Anchorage, AK 99513

RE: Request to extend public scoping comment period for South NPR-A Plan

Dear Director Bisson:

On behalf of the Western Arctic Caribou Herd Working Group, I am requesting that you extend the public scoping comment period for the South National Petroleum Reserve-Alaska (NPR-A) Integrated Activity Plan (IAP)/Environmental Impact Assessment (EIS).

The Caribou Working Group is composed of a broad spectrum of stakeholders with interest, knowledge, and concern for the Western Arctic Caribou Herd. The goal of our group is to work together to ensure the long-term conservation of the herd and the ecosystem on which it depends in order to maintain traditional and other uses for the benefit of all people now and in the future. At least 40 Native communities depend on the Western Arctic Caribou Herd for subsistence needs.

The Western Arctic Caribou Herd is one of the largest caribou herds in North America with a population of 490,000 animals when last censused in 2003. This herd is a critically important subsistence resource in northwestern Alaska providing an estimated annual subsistence harvest of 15,000-20,000 caribou to communities within the range of the herd. The herd is also important to recreational hunters and others who live outside the region. One of the goals of the Western Arctic Caribou Herd Cooperative Management Plan (2003) is to "assess and protect important habitats of the Western Arctic Herd." BLM's management plan for the South NPR-A is of supreme importance to the future of this herd, the goals of the Cooperative Management Plan, and the people in 40 communities who use, depend on, and enjoy the Western Arctic Caribou Herd.

We request that you extend the scoping comment period on South NPR-A to 120 days or October 15, 2005. We believe additional time is needed to provide our diverse members an opportunity to meet, review and evaluate the important issues related to caribou and their habitats in southern NPR-A, and develop thoughtful and meaningful comments to you on this very important management plan.

We also request that BLM staff present South NPR-A plans, schedules, issues, and details to the Caribou Working Group – NPRA Committee at a mutually agreeable time in advance of the public comment deadline. A meeting during the third week of August or late September would be the best time to convene the Committee. This type of presentation by BLM was planned when scoping was scheduled for Kotzebue in April 2005, but did not happen because scoping was rescheduled and the Caribou Working Group did not receive grant funds needed to support the Committee meeting. Now

Appendix B (cont.)

that scoping for South NPR-A has started, I think it is very important that BLM and the Committee meet together so the Caribou Working Group is adequately informed about issues, plans, and process as the IAP/EIS planning process begins.

The current comment period, scheduled to end on August 26, 2005, does not provide the Caribou Working Group adequate time to address the important issues and concerns that need to be considered by BLM planners as they prepare an Integrated Activity Plan and EIS. Scoping meetings will occur in mid-summer when many of our members are widely scattered and engaged in seasonal employment or subsistence activities. A 60-day public comment period, during the summer, with an August 26 deadline, is simply inadequate for the Caribou Working Group to prepare the kind of comments we believe are necessary to cover this important planning process.

The southern planning area of the NPR-A is one of the most important ecological areas in Alaska's arctic region and it provides essential habitat for caribou. The Working Group has particular interest in South NPR-A because it encompasses important seasonal ranges of the Western Arctic Caribou Herd, including approximately 80 percent of the herd's calving area, major portions of summer range, and crucial insect relief habitat. These seasonal habitats are essential to the normal annual cycle of this important caribou herd.

Since residents of 40 communities in Northwest Alaska will be impacted by decisions made in this planning effort, please consider our request for a comment period extension and presentation of information to the Caribou Working Group – NPRA Committee. The decisions made during this process will have a profound affect on Alaska's largest caribou herd and the future of the people who have depended on this herd for centuries.

Thank you for considering our requests.

Sincerely.

Raymond Stoney Chair

Cc: Robert Schneider, BLM

Jim Ducker, BLM Rowan Gould, FWS

McKie Campbell, ADF&G Marcia Blaszak, NPS

George Ahmangak Sr. N

George Ahmaogak, Sr., NSB Ross Schaeffer, Sr., NWAB on the South National Petroleum Reserve—Alaska Integrated Activity Plan/Environmental Impact Statement and an extension in the Request for Information, Call for Nominations and Comments and the solicitation of interest in hardrock and coal mining. The original notice issued June 15, 2005 provided for a scoping period and the request for other comment and information to end on August 26, 2005. BLM is extending the scoping and related comment and information gathering period through October 17, 2004 and will reschedule scoping meetings in Anaktuvuk Pass, Anchorage, Atqasuk, Barrow, Buckland, Fairbanks, Koyuk, Nome, Nuigsut, Point Hope, Point Lay, and Wainwright.

DATES: Scoping comments and responses to the Call for Nominations will be accepted through October 17,

ADDRESSES: Scoping comments should be submitted to: South NPR-A Planning Team Leader, 222 West 7th Avenue, #13, Anchorage, Alaska 99513-7599. Responses to the Call for Nominations must be submitted in envelopes labeled "Nominations Related to the South NPR-A IAP/EIS" to protect the confidentiality of the nominations. They are to be addressed to: Call for Nominations, South NPR-A Team, 222 West 7th Avenue, #13, Anchorage, Alaska 99513-7599.

FOR FURTHER INFORMATION CONTACT: Jim Ducker (907-271-3130) or Susan Childs (907-271-1985) by phone or by mail at 222 West 7th Avenue, #13, Anchorage, AK 99513-7599.

SUPPLEMENTARY INFORMATION: The Notice of Intent issued on June 15, 2005 provided for scoping comments on issues relevant to the scope of the plan to be received through August 26, 2005. The Western Arctic Caribou Herd Working Group (Working Group) has requested an extension in the scoping comment period. BLM has decided to act in accordance to the Working Group's request to better accommodate the subsistence needs of local residents. Therefore, scoping comments on the issues relevant to the scope of the South Plan will now be accepted through October 17, 2005 and the scoping meeting schedule will be adjusted and announced to the public. In addition. the original Notice of Intent provided for a Call for Nominations pursuant to 43 CFR 3131.1 and 3131.2 of relevant

information related to possible oil and

extension of the public scoping period

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[AK-930-04-1610-DB]

Notice of Extension of the Public Scoping Period for the South National Petroleum Reserve—Alaska Integrated Activity Plan/Environmental Impact Statement and Request for Information, Call for Nominations and Comments, and Solicitation of Interest in Hardrock and Coal Mining

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of extension.

SUMMARY: The Bureau of Land Management (BLM) announces an gas leasing. The Call for Nominations is also extended through October 17, 2005.

Julia Dougan,

Associate State Director. [FR Doc. 05-16101 Filed 8-12-05; 8:45 am] BILLING CODE 4310-JA-P

Appendix D

Scoping Meeting Comments

The following table presents verbal comments made at the public scoping meetings. The comments are organized by village and presented in the order that the meetings were held and in the order that the comments were given.

Topic/Resource	Comment
Kiana 7/18/2005	
Planning/Process	The scoping period is not long enough, many people are not available because they are out hunting and fishing; the scoping period needs to be extended.
Planning/Process	All agencies and the environmental community need to work together.
Air and water	Any impacts to air and water quality from mining activities would be a concern to people of Kiana.
Subsistence	Caribou migration especially along the Squirrel River is very important to people of Kiana.
Management	Is the National Petroleum Reserve the same thing as the Naval Petroleum Reserve?
Recreation	BLM should consider limiting number of special recreation permits along the Colville, too many permits issued along the Squirrel River.
Ambler 7/19/05	
Planning/Process	Not many people present, not going to hear a lot.
Impacts to	Ambler is very dependent on caribou, any development, including a road to the Haul Road
Caribou/	(Dalton Highway) to support such development, could result in caribou populations suffering;
Subsistence	this would be devastating to the people of Ambler.
Off shore impacts	If resources are transported west to the coast, spills and other offshore impacts would be of
	great concern to coastal communities.
Wild and scenic	Opposed to W&SR designation because it can restrict local (subsistence) activities and bring
rivers	in rafters and other outsiders; especially opposed to any such designation on the Squirrel River.
Planning/Process	No one present that represents the village.
Kotzebue 7/20/2005	5
Planning/Process	If more funding was available would schedule be shortened?
Planning/Process	What additional data gathering and inventory efforts are going to occur as part of this planning process – is there adequate information available?
BLM management	BLM has suggested that mining in NPRA, if authorized, might occur under a leasing program
•	rather than under the 1872 mining law. Why is that important? What does it mean to allow
	hardrock development under a leasing program?
Planning /Process	Decisions made in this plan could change if the administration changes as happened in NE NPR-A.
Planning/Process	How will decisions made in the South Plan influence the NE and NW plans and conversely
•	will decisions made in NE and NW influence the South; BLM should build on previous
	planning efforts?
Planning/Process	What is the source of resource information BLM uses to make its management decisions?
	Does BLM have the information to know what resources are present and need protection?
Planning/Process	How do other agencies share or contribute information so that BLM has best available
	information – is there a formal process?
WS&R and	Will decisions regarding Wild and Scenic Rivers be made as part of the South Plan or the
Planning/Process	Colville River Management Plan?
Oil and gas	When will it be known what level of interest the oil industry has in the area?
development	

Topic/Resource	Comment
Planning/Process	Who was sent the Notice of Intent to Plan – were current permittees in the area notified?
Planning/Process	BLM should meet with the Western Arctic Caribou Herd Working Group about this planning
	effort
Cumulative	Focusing on the South Planning Area is good, but, caribou migrate and many activities and
impacts	factors outside of the Planning Area will occur over many years and will impact caribou.
	BLM needs to think long term and cumulatively the long term impacts are frightening
Planning/Process	BLM should have brought to this meeting more information about where the Seward Kobuk
	Plan in going to give folks a better idea of the "Big Picture"
Planning/Process	What does BLM do with new information obtained after the end of the scoping period on
	August 26 th (editor's note: subsequent to this meeting the scoping period was extended).
Kivilina 7/21/2005	
Consultation	Need to be honest about what is being proposed and visit all effected communities.
Consultation	Where is the BLM in the planning process? Adequate studies and analysis of impacts relating
	to subsistence need to involve the villages from the beginning of the process
Consultation	The villages and tribal governments need to be deeply involved in the South Planning process
	if BLM is to accurately understand the impacts on subsistence and the villages – the hunter
	need to be involved. Community involvement does not mean the Borough but the villages
C 1, .; 1	and tribal governments.
Consultation and	The villagers can do a better job than anyone else understanding the impacts. Let the villages
Planning/Process	know what the proposal is and let them do their own subsistence study to supplement BLM's.
Consultation	What is BLM doing to involve the villages? There needs to be honest an open discussion
	with negotiation and compromise possible – a middle ground in government to government
D. 1 D	consultation needs to be reached.
Red Dog	Studies and plans done for Red Dog Mine and the Red Dog Port are seriously flawed and do not accurately depict impacts on subsistence, caribou and sea mammals.
Red Dog	The road from Red Dog to the coast changed the migration route of caribou and resulted in
Red Dog	difficult adjustments for the village. A road from the Drenchwater area to the coast would be
	much longer (approx. 200 vs. 50 miles) and would cross calving area and could have a
	devastating impact.
Impacts to caribou	Airborne contaminants could ultimately be ingested by caribou negatively affecting their
impues to curreeu	health.
Impacts to caribou	Period of caribou calving is time when caribou are most vulnerable to disturbance.
Impacts to caribou	Development in the calving area is like stepping on holy ground; this area and the western
and subsistence	arctic caribou herd is our dinner table.
Impacts of	Roads and vehicular traffic (which at Red Dog is 24 hours a day 7 days a week) associated
roads/Red Dog	with coal/hardrock mineral development would cut across caribou summer range changing
	movement patterns - caribou will parallel roads (and not cross) and shy away from vehicles.
	Roads would also open area to access
Coal mining	Where exactly would coal mining occur - coal mining in caribou calving areas would have
	devastating impacts
Red Dog	Is development in South NPR-A tied into proposed Red Dog Port expansion – Expansion of
	this port or creation of new deep water ports will have a big (and adverse) impact on sea
	mammals.
Oil and gas	What will be the extent of development based on existing resources- how much oil and gas is
	really there; have wells been drilled?
Impacts: Water	Mining in particular could have adverse impacts on water quality; of particular concern are
Quality	the Kivilina and Wulik Rivers. Impacts on these rivers directly impact people of Kivilina.
Cumulative	Need to be aware of the potential lifespan of any development project (consider this in impact
impacts	analysis).
Impacts from	Spills could occur as a result of trucks overturning especially given winter weather conditions
roads/spills	and amount of traffic that can be anticipated.

Topic/Resource	Comment
Anchorage 8/16/20	05
Planning/Process	As to potential legislation for opening the South NPR-A to coal and hard rock mining: at
_	what point does this become a legislative EIS?
Alternatives	It is against the law to analyze what we cannot propose. The rationale for looking at
	something that is illegal does not make sense. I do not understand how you can have an
	alternative that is against the law.
Alternatives	Can we (BLM) include hardrock mining in a Preferred Alternative?
Cumulative	The inclusion of hardrock mining would require BLM to include a transportation scenario.
impacts	This is going to require a very robust cumulative impact analyses.
Planning/Process	There has to be a link between onshore and offshore impacts.
	It is important to gather a group of experts and others and look at the subsistence impacts i.e.
C 1 :	Nature Conservancy, North Slope communities, etc.
Geologic	There seems to be a dearth of geologic research. The BLM has a secret organization called
information Water and gravel	the USGS and they should be tapped into for information. Water and gravel will be limited and new technologies will have to be developed in order to
water and graver	extract those resources
National resources	A concern is that too much pressure will be applied from the people up North that really do
	not have a stake in this area. This State and the Nation need these resources. We need to be
	concerned with the needs of the whole nation.
W&SR	Will you recommend some rivers for Wild and Scenic designation? And have you done this
TILO OD	in other management plans
W&SR	The State wants a role in any designating of wild and scenic rivers.
W&SR	Wouldn't wild and scenic river designations come under the No More Clause?
Special Areas	The two Special Areas should be studied and compared to any wild and scenic river designation.
Caribou and	Caribou and Raptors are our concerns. Please look closely at the transmitter data of the
raptors	WACH. These resources will also be important to look at in relation to development of
	roads, pipelines, transmission lines. Raptors – nationwide there is a rich literature on
	problems and also non-problems for these resources.
Waterfowl;	We were disappointed in the level of assessment regarding waterfowl in the Northeast
adequacy of	Amendment and would like for BLM to do a better job in this plan.
impact assessment	Completive offects for the case are a his deal. Must consider many things a single fit a climate
Cumulative impacts	Cumulative effects for the area are a big deal. Must consider many things: air traffic, climate change, etc.
Impacts (general)	Do not become overly focused on caribou and underestimate impacts to other wildlife and on
impacts (general)	resources such as marine resources, wilderness resources, coastal habitat, etc. Also
	concerned about impacts to the National Park (Noatak) from any development in the South
	NPR-A, additional global warming from coal development, etc.
Coastal	The degree of coastal development from offshore interest should be looked at.
development	
BLM management	This is a National Petroleum Reserve, not a National Caribou Reserve.
BLM management	Look at developing coal and minerals in this area. This is the right process for making
	recommendations to Congress to open this area to mining, etc. We highly recommend that
	this area be opened to oil and gas leasing and mineral entry. Highly recommend that the
	geologic mapping be concluded before any decisions are made. Technological applications
	currently are benign to the surface. We highly recommend these techniques be employed.
	Both mineral geologists and biologists from USGS should be part of the actual team. Their
	experience from around the world will be very valuable. This area has tremendous potential
	for mineral development. We encourage the BLM to be absolutely thorough. ANILCA was just celebrated and there was a promise of "no more." The intent of ANILCA protection has
	been met. We encourage BLM to focus on the development of the area's resources.
	occir met. We encourage DEW to focus on the development of the area's resources.

Topic/Resource	Comment
Water and air	I am the coalbed methane standard setter. I am concerned that corporations are not following
quality	state environmental laws. By adopting /Federal Air Quality Standards, we are allowing the
	Fed Gov to make the decisions for the State. I remember reading about grasses in the area.
	Some of the oil companies did studies on why pollination was not occurring because of their
	activities. BLM should study pollination issues caused by oil and gas activities. I have an
	action in the ninth circuit regarding land classification. Narrow water quality standards.
	There is a limited amount of water in this area.
Alaska Coastal	There is no consistency in Coastal Management Standards. We should use science instead of
Management	regulations to maintain consistency. These inconsistencies must be addressed. The
Program	enforceable components of the CMP are not happening. We feel intimidated by those who
	have more knowledge, and I know there are a lot of people in here that are very smart, but I
	am the standard of the population. The Courts are trying to transfer my property rights while
	I am in litigation.
Mining scenarios	I am interested in developing the phosphates in the South for organic fertilizer and how they
	will be removed. I am interested in the actual technology of oil and gas.
Coastal impacts	You must examine impacts to the coast and transportation corridors.
Studies	BLM and industry are not doing the studiesif other countries have this technology, then
	these patents are not privileged. Economics – such as tax credits, I object to tax credits
	because that is technically re-writing the lease
Cumulative	Cumulative Impacts – increasing activity in Northeast and Northwest should be looked at. A
impacts	new economic issue is the new Energy Bill. This should be analyzed to look at whether the
	focus should just stay on the areas that are open. Some places are very special in the NPR-A.
Sociocultural	Drug and alcohol abuse, family violence, etc. has decreased due to the fact that they are
impacts	employed. There should be an analyses included that looks at the impacts from employment.
	The ability to have a job close to where you live is a huge impact (positive) These social and
a	economic issues should be addressed.
Socioeconomic	The ability to have a job close to where you live is a huge impact (positive) These social and
impacts	economic issues are irrelevant to this planning effort since there are no villages in the South
BLM management	Planning Area. I advocate sound environmental implementation.
Planning/Process	Industry preparedness is abstract reasoning. This presumes that some economical damage is
1 familing/1 focess	probable and possible. I don't agree with abstract reasoning. I believe in strong scientific
	reasoning. This makes future reasoning impossible. BLM needs to address that things are
	tipped too far to the abstract. I don't like the concept of 1000 year rule.
Planning/Process	What about the Resource Protection Council looking at military over flights. Issues with lack
1 1411111115/11 100055	of water, lack of gravel.
Koyuk 8/22/2005	
Oil and gas	Is there much interest by industry to develop the area (note: the commenter was hoping that
-	development would not occur)
Oil and gas	What leasing activity has already occurred in the area and is (or can) development be limited
	by the size of the lease?
Impacts to caribou	Were impacts to the caribou considered prior to the leasing which occurred in the 80's?
Impacts to caribou	What will the effects of development be to the calving area and the caribou?
Impacts to caribou	The caribou herd funnels thru the Koyuk area so anything that affects the herd to the north
	will be seen in Koyuk; changes in the herd's behavior even around Koyuk could be the result
	of activities to the north.
Nome 8/23/2005	
Dlanning/Dragge	Is development a foregone conclusion? It seems as if the decision to open the area and allow
Planning/Process	
Planning/Process	development has already been made.
Planning/Process	development has already been made. Who is responsible for determining the impacts of development and communicating the

Topic/Resource	Comment
Planning/Process	Adequate communication with the villages is important. This (scoping) meeting is so early in
<i>G</i>	the process that it is not and can not be effective in addressing what might occur in the area
	and what the impacts might be. More meetings are needed when more is known. Reliance
	on the Western Arctic Caribou Herd Working Group to disseminate information is not
	enough; the villages must be directly involved.
Planning/Process	There was not adequate public notice of the meeting. Without adequate notice there was not
C	time to prepare. How can the public be expected to provide educated/informed input without
	the time to prepare?
Planning/Process	Can the area be left alone – is this an option?
Raptors	The Colville River is an extremely important area for raptors and it is good that BLM (as
1	noted in the presentation) recognizes the importance of the area, BUT, scattered around the
	south Planning area are outcroppings and cliffs that provide nesting sites for a whole suite of
	raptors: eagles, falcons, and hawks, that "rotate thru". The South Planning Area has a large
	percentage of Alaska's raptor population and preservation and protection of the nesting areas
	is very important. Raptors have a high public profile and are a good indicator of
	environmental change – they need to be protected.
Raptors	Birds are sensitive to disturbance tolerating things gradually. At Red Dog exploratory mineral
	surveys were conducted at the very time gyrfalcons and other raptors were nesting.
Studies	What is the latest information available regarding the impacts of development on caribou, of
	particular concern are pipelines.
Planning/Process	It is difficult to get the word out to the general public and make it relevant and meaningful.
1 1411111115/11 100000	For meetings with local folks to be beneficial and to genuinely inform and involve the public
	BLM needs to make sure the information is received, processed and understood. Need to use
	cultural forms of communication. Radio interviews are a good tool.
Planning/Process	Educate the educators so they are more effective communicating with the villages. Recognize
1 1411111115/11100055	that there are many meetings competing for people's time.
Cumulative	Need to think of the bigger long term picture: what will the area be like in 50 years as a result
impacts	of all development not just from one project? Impacts to birds, bears and other species, as
mpacts	well as caribou, need to be considered. And consider that calving is but one activity in the
	caribou life cycle and the calving area is but one area used by the caribou as it moves through
	its range.
Planning/Process	What is the attitude of the agency – it seems to be leaning toward development.
Planning/Process	Much of what BLM is doing is driven by the administration in Washington; it is frustrating
1 1411111119/11/00055	that we at this level are not in control and our concerns may not be heard.
Alternatives	BLM should broaden its outlook and consider recommending that Congress, rather than open
1 internatives	the area to mining, make the National Petroleum Reserve – Alaska a Wildlife Refuge.
Alternatives	BLM should have a more comprehensive management strategy that considers not just the
1 Hiterinatives	planning area but the entire North Slope; we are perilously close to committing the entire
	North Slope to development especially if the Arctic NWR 1002 area is opened to
	development
Alternatives	Be careful - protect the resources.
Colville River	We need to plan for the Colville in a way that protects the naturalness of the area and not let
COIVING RIVE	increasing use and pressure from a public more in tune with theme park adventure or
	amusement park thrill rides detract from the natural aesthetic.
Colville River	Look at a variety of mechanisms to protect resources such as restrictions relating to certain
COIVING RIVE	areas such as willow bars important for moose, timing restrictions to protect nesting
	activities, restrictions on certain activities such as motor boating to protect naturalness. As to
	nesting can't necessarily just protect an identified nest site because they change as banks
	erode and cliffs slough off from year to year.
Impacts to raptors	Raptors are very sensitive to contaminants; one mine might not cause significant levels of
impacts to raptors	contamination from "escaping" minerals but as more and more operations are allowed the
	chances increase. The effects will be spotted quickly in raptors
Studies	Should have good base-line information with follow-up studies so impacts are accurately
Studies	noted.
	HOUGE.

Topic/Resource	Comment
Impacts to	Concerned about the people who subsist on animals that are carrying contaminants.
subsistence users	
Red Dog	Dust along Red Dog road can disperse for up to 25 miles spreading contamination over wide area.
Consultation	Even though BLM is holding 17 public meetings and is working with the Western Arctic Herd Working Group that doesn't mean that people are happy with the work of the Working Group or that having a lot of public meetings fulfills BLM's obligation to involve the public – there is only one Native at this meeting.
Cumulative	Local pollution in combination with worldwide pollution and global warming is a concern
impacts	
Coal mining	I don't believe environmental costs are worth any economic gains; when is enough, enough?
Buckland 8/24/200	5
Planning/Process	How are you including the other northern villages in this planning process? The Western Arctic Caribou Herd is important to the people of the North Slope and they know best how to manage the area. Local knowledge must be considered.
Mining	What is the level of industry interest in developing coal and hardrock minerals - such development could affect caribou.
Impact to caribou	Our main concern is that the migration of the Western Arctic Caribou Herd not be effected.
Wild and Scenic Rivers	What will BLM recommend regarding Wild and Scenic Rivers?
Oil and gas leasing	What will BLM recommend regarding Oil and gas leasing?
Planning/Process	We are interested in what the other villages have to say regarding this plan.
Additional studies	We want to make sure the plan has provisions to protect caribou, whales and other resources important to us and that appropriate studies are conducted to identify the impacts that do occur.
Impacts to caribou	Worried that chemicals will pollute water that caribou drink, harming the caribou and those dependent on them for food.
Enforcement	If there are restrictions on development in an area, BLM needs to enforce those restrictions – how is that done?
Economic benefits of development	If oil is found and development occurs we would like to benefit and receive cheaper fuel.
Impacts to birds	If development occurs need to protect nesting areas and not disturb nesting birds.
Point Hope 8/25/20	
Planning/Process	Need to involve the North Slope Borough Department of Wildlife Management in this process – they were supposed to be at the meeting today.
Planning/Process	This meeting needs to be rescheduled – the Borough is not represented and no elders or elected officials are present. The North Slope Village Coordinator's Office can help with this and make sure the exact time, date, and purpose of the meeting is known. Door prizes should be given to encourage a good turn out.
Impact funds	If areas are opened to coal and hardrock mining will there be impacts to Point Hope; will Point Hope be able to benefit by receiving impact funds and getting jobs.
Impacts from access	Coal or hardrock mining will mean transportation requirements that could impact caribou migration, calving, and bird habitat.
Planning/Process	Who is directing this plan – BLM or Congress?
Subsistence	BLM needs to have subsistence specialists who can fairly and accurately analyze subsistence impacts resulting from coal and hardrock mining.
Subsistence	Don't put mineral development of NPR-A in front of subsistence
Planning/Process Impact funds	Holding this meeting in the afternoon is bad, many people are working and can't attend It's strange that the Borough can't tax any development in NPR-A and that it's silent on impact funds and their distribution. Point Hope is not getting anything. We are impacted as well as Nuiqsut.

Comment
There should be a mechanism for all villages to share in impact funds; Point Hope is being
discriminated against.
Tribe has not been consulted about Endanger Species Act
Who is representing Point Hope – the Borough? We don't know who is representing us.
BLM should deal directly with local villages and not rely on Borough and Native
Corporations. BLM should deal directly with tribal governments especially those that depend
on the Western Arctic Caribou Herd.
Our main concern is protecting subsistence, then in being compensated for impacts through
impact funds. BLM must consult with tribal governments.
Development is moving in this direction across NPR-A and soon NPR-A will be 100% open
to oil and gas leasing. Cumulative impacts of this will be here soon.
Concern that because the area is a petroleum reserve the caribou and the calving area won't
receive adequate protection. These caribou are more vulnerable than those in the Arctic
National Wildlife Refuge and are apt to be more impacted. We can't afford to lose this
valuable resource.
We don't trust the borough to represent our best interests. ICAS and the village governments
need to be consulted.
Will BLM buy Native allotments in impacted areas? Need to respect the land and valid
existing rights. People who live in area of development need to be consulted.
Will BLM be designating any wild and scenic rivers – concerned that designation will
(negatively) impact users.
Concerned about Western Arctic Herd, the calving grounds, peregrine falcons and other
living things in the area as well as the people who live and hunt in the area.
Development will bring roads, trains and corresponding impacts.
DIM 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
BLM needs to be doing studies on wildlife to know what the impacts are.
This is a poor turn out. There are no elders or community leaders here to provide information.
Another meeting should be scheduled at a time when the elders and leaders will be available.
BLM needs to make a better effort to involve more people especially the elders.
We need to meet again
The untouched is being touched
Economic development is upon in us and we need to be heard. BLM should find out who
decides who gets impact funds and how they are distributed - how is this done? Who is eligible for funds? The North Slope Borough dictates this and doesn't tell Point Hope
anything. The Borough is discriminating against Point Hope. Point Hope needs to be involved in all of NPR-A planning because of caribou and cumulative
impacts.
The Western Arctic Caribou Herd Working Group is depending on the federal government
because the State wants to shut them down.
Economic factors need to be considered in cumulative for example, if caribou are pushed
farther away by development we will have to go farther to hunt them taking more time and
costing more in gas.
Need to add in federally recognized tribal governments in list of entities the BLM will work
cooperatively with in developing the plan.
Don't support such designations especially if controlled by the state because the state
encourages recreation and ecotourism at the expense of the Native communities and Native
subsistence activities.
Tribes should control W&SR corridors and other resources of concern.
There is a lacks the commitment and enforcement of previous decisions in NPR-A. We are

Topic/Resource	Comment
Planning/Process	There was not adequate notice of this meeting. Not only are elders and council members not
	here but there was not adequate time to prepare. Future notices need to be sent through
	Village Coordinators Office. Meeting needs to be rescheduled – evening is best time so that
	those with jobs can attend and students so they can see how decisions are made.
Alternatives/mitig	BLM's alternatives need to provide a backup plan that will provide caribou/reindeer if
ation	disturbance from development prevents us from getting enough caribou; alternatives also
	need to provide another livelihood if subsistence resources are lost.
Cumulative	Red Dog has changed caribou migration routes; additional development in South NPR-A
impacts	could change it more and have even greater impacts on caribou and Point Hope. Red Dog and development in South could have cumulative impacts on fish water quality and caribou.
	The fish and water quality of the Kivilina River are already impacted by Red Dog. Red Dog
	is 10 th highest polluter in U.S lead poisoning, ocean impacts, everything is connected.
Rivers	Rivers are vital to our livelihood and to animals.
Impacts to	Why should we support development in NPR-A when we get no benefits such as jobs; we
social/cultural	only see the loss of renewable subsistence resources and our way of life. Point Hope will
systems	experience the direct loss of its livelihood if the area is developed. We stand a chance to lose
-	everything.
Cumulative	BLM needs to consider MMS plans to lease offshore together with development in the South
impacts	NPR-A.
Native	Stakeholders should get a % of ownership NPR-A; we feel like foreigners
sovereignty	
Cumulative	Need to factor in global climate change in impact assessment
impacts	
Nuiqsut 8/31/2005	
Colville River	Will the Colville River Plan place restrictions on subsistence activities along the river?
Consultation	It would be good to hear from Atqasuk, Wainwright and Pt. Lay since the South Planning
G 1:	Area is their subsistence use area.
Consultation	Since the North Slope Borough has a little land in the Planning Area have they commented yet?
Subsistence	Nuiqsut hunts caribou from the Western Arctic Herd as well as the Central and Porcupine Herds.
Traditional use	We only go into the South Planning Area in winter when we can travel there by snow
	machine so our use is mainly furbearer hunting and opportune take. But we do take Western
	Arctic Caribou here so it is important
Traditional use	We do have concerns for the people who have allotments and camps in the area they rely on the Western Arctic Herd.
Impacts to caribou	There is concern that mining will affect caribou
Alternatives/Mitig	If anything is done which might jeopardize the caribou you need to provide us a reindeer
ation	herd.
Coal mining	Prefer coal mining to other types of mining; there has never been a problem with coal mining.
Alternatives/Mitig	The plan needs to address and mitigate the impacts to communities that have economic
ation	problems
Impacts from	Red Dog is very much a concern to northwest (arctic slope) residents. We too are very
mining	concerned about the effects that might come with mining. Without knowing what type of
	mining might occur we can only ask would there be transportation routes that would impact
5 1	wildlife and impacts to rivers are very much a concern.
Development -	If development can take place without impacts to the resources we rely on especially the
general	Colville River it would be OK.
Impacts to social/cultural	Oil and gas development is changing our way of life; the white man is running the country and we are told we have to do this we have to do that. It was a different life before oil was
systems	found but no one asks questions about how it was.
Systems	Tourid out no one asks questions about now it was.

Topic/Resource	Comment
Alternatives/	The community of Nuiqsut needs help getting money to document memories of the elders of
Mitigation	the community on how it used to be. The BIA has turned us down money to videotape and
. .	record the elders speaking. It needs to be done before it is too late.
Colville River	You talk about planning for the (Colville) river but we can't control it; the river will do what
	the river will do.
Impacts from	Way back when they found oil was like kerosene that was spilled on lakes near Umiat – there
spills	was nothing that could be done about it.
Planning/Process	What is BLM's intent in opening South NPR-A?
<i>S</i>	The second secon
Alternatives/	If coal leasing is allowed the lease should require the creation of a mitigation fund that would
Mitigation	be distributed to impacted communities to compensate for the loss of caribou or other
C	resources.
Impacts to rivers	There are a lot of rivers that could be impacted if the plan goes forward and development
•	allowed; BLM needs to a lot of work to protect these rivers.
Planning/Process	How long will it take you to complete the plan?
Colville River	Regarding the Colville River plan, Natives are not too much into recreation.
T 1 1 0/1/07	1 /
Fairbanks 9/1/05	
Special Areas	The Utokok Uplands Special Area needs to be expanded to adequately cover important
1	caribou habitat.
Special Areas	Important habitat exists outside Special Areas and it too needs to receive equal and adequate
1	protection.
Alternatives:	Not only should the alternatives consider adjusting boundaries of the special areas to provide
Congressional	more protection, but you should consider making recommendations to Congress to provide
protection	legislative designation/protection to these areas. This seems to provide a more balanced
1	range of alternatives given that you might include recommendation to Congress to open the
	area to mining.
Cumulative	Mineral development may be a long way off given the economics, but if the area is opened to
Impacts	mining we need to recognize that in the long term the economics will likely change and it
	won't be just one or two mine sites that are developed but many. And although the
	development of some mines may be a long way off that doesn't lessen impacts. We need to a
	hard look at the long term picture.
Development	Impact assessments need to based on development scenarios that consider all access options
scenarios	and the necessary infrastructure including bridges, roads railroads, port facilities, shipping
	routes, etc.
Cumulative	NPR-A is already impacted by airborne pollutants from Siberia and Chernobyl, this needs to
impacts	be considered in the cumulative impacts
Coal mining	Taking into account global warming we should not be considering mining more coal
Alternatives:	Wilderness (or Wild and Scenic River) designations should be considered, specifically along
wilderness	Utokok and Colville Rivers, including their tributaries.
Consultation	Extra effort is warranted to assure that villages, tribal governments, other native organizations
	are included in the planning process whether as cooperating agencies, through government to
	government consultation or other meaningful involvement.
Planning/Process	Poor timing (hunting season) and inadequate notification, not lack of public interest, has
	resulted in low turnout for the meeting.
Planning/Process	BLM has a responsibility to educate and inform the public about the Petroleum Reserve and
	not rely on the Environmental Center and other organizations to do this. BLM needs to get
	information out to the public through newspaper, radio, etc., so that the public is aware of the
	area's values and be able to understand what is at stake.
Alternatives:	We're looking for parity in the process and in the range of alternatives. You're considering
wilderness	alternatives that propose something (mining) that's currently illegal, yet you're not
	considering wilderness because of a policy restriction.
Consultation	BLM should do more than just invite people to meetings to gather information; BLM should
	conduct surveys or otherwise seek out traditional knowledge.

Topic/Resource	Comment
Planning/Process	The lack of a website is hindering the public involvement especially for those outside of
1 141111115/1100055	Alaska. Issues being addressed in the South Plan are national in scope. Meetings on the
	Draft should be held in lower 48 and publication of the Draft should be delayed until the
	website is back up.
Alternatives:	The South Planning Area is one of the least trammeled, most pristine and beautiful areas in
preservation and	the country, yet BLM is not now suggesting any alternatives that will consider preservation –
wilderness	ideas along these lines must be generated by the public. On the other hand, BLM is
	considering taking the initiative to allow mineral development by considering alternatives
	that recommend the area be opened to mining. This does not seem to be an even playing
	field.
Cumulative	Alternatives that allow mining must be realistic in considering what it would take to actually
impacts and	develop the area's minerals; scenarios need to consider number of mines, miles of road.
scenarios	Especially concerned about impacts to the Utokok Uplands Special Area. Must look into the
	future and the accumulating impacts of one mine then another and another. Don't underestimate the impacts.
Planning/process	Struck by the futility of trying to make the scoping process a meaningful and balance public
r iaiiiiiig/process	process.
Wild and Scenic	Need more information about the process to nominate rivers for Wild and Scenic River
Rivers	designation
Planning/Process	I am reluctant to comment based on past experience and resulting cynicism in BLM's
	planning process.
Alternatives:	Mitigating impacts of development through stipulation is not always enough. In some areas
wilderness	only putting the area off limits is adequate protection. Wilderness designation in some areas
	needs to be considered.
Planning/Process	There is an inherent imbalance and bias in this process; even in the statement of work written
	by BLM when the South Plan was to be contracted, BLM did not ask the contractor to
	examine the (public) interest in setting aside Wilderness areas or designating Wild and Scenic Rivers.
Colville River	Wild and Scenic River Designation along the Colville isn't bold enough, something bigger is
Colvine River	needed – 1 mile corridor along river is not enough.
Planning/Process	Do not understand what is meant be community based planning – what is that?
Wilderness	Some values can't be protected by mitigation alone, wilderness, for example, can't be
· · · · · · · · · · · · · · · · · · ·	protected by mitigation - 1 mile setbacks alone can not protect wilderness values.
Congressional	Plan decisions can be overturned and changed; there is no assurance that the decision won't
designations	be changed.
Planning/Process	South Plan should abide by or follow guidance and mitigation established in the North Slope
	Borough Comprehensive Plan.
Wainwright 9/12/0	5
Planning/Process	We should allow time during meeting for elder to speak with someone recording their comments for signature.
Planning/Process	We should put out flyers a month in advance to make sure everyone is notified.
Planning/Process	We should get a hold of tribal council to express their ideas and invite the elders.
Impacts to	Need to be concerned with impacts to cabin/camp sites not just Native allotments.
subsistence	The second with impacts to each camp sites not just runt and missing.
Mining	Impacts from Mining would be widespread affecting air, water, and other resources.
Special Areas	Utokok Special Area is not big enough; it does not offer adequate protection to birds outside
<u>. </u>	the Special Area; there needs to be additional protection along the Kuk River and other areas.
Planning/Process	Maps need to have more place names so familiar areas can be located. Maps should use the
	local or Inupiat place names. Maps should also be more detailed, perhaps 1:250,000 and
	show cabins, historic sites, caribou migration routes, etc., not just rivers.
Impacts to rivers	Rivers are necessary to fish, caribou and thus to us, the rivers must be protected.
Impacts to caribou	Caribou migration routes must be protected and caribou migration not impeded

Topic/Resource	Comment		
Consultation	A committee should be put together that includes elders and other leaders from Wainwright		
	so that local concerns get to BLM.		
Mitigation:	Wainwright wants natural gas to be available for local use if any is developed in this area.		
economic			
Point Lay 9/13/200	Point Lay 9/13/2005		
Impact Funds	We would like to share in the impact funds. Currently the North Slope Borough says we are		
•	not impacted. What are the criteria for deciding who gets impact funds?		
Calving Area	The caribou calving area is bigger than depicted on BLM's map.		
Additional analysis	If oil and gas leases are sold would there be additional environmental analyses.		
Special Area	Can the Utukok Special Area be enlarged through the planning process to more accurately		
	encompass what is on the ground? Caribou use the area between Wainwright and Pt. Lay a lot.		
Mining	Don't open the area to mining		
Planning/Process	Will there be activity level plans like you plan to do for the Colville River for the Kuk, Utukok and Kukoluk Rivers?		
Planning/Process	Can our comments be faxed?		
Coal mining	Can the village of Pt. Lay make a mining claim for coal?		
Hard rock mining	We are worried that hard rock mining would result in water pollution; also concerned about		
_	the access that would have to be developed to mine the area.		
Cultural site	There is an old village site $60 - 70$ miles up the Utukok River that needs to be protected.		
Impacts: wildlife	Wolves, polar bears, muskoxen too occur in and near the area and need to be considered.		
Well	Concerned with the abandonment of oil wells, in the past well sites were left a mess; need to		
abandonment	enforce rules.		
Planning/Process	Will comment summaries and answers to questions be returned to villages?		
Barrow 9/14/05			
Planning/Process	Will our comments be related to the folks at the Anchorage scoping meeting?		
Consultation	BLM needs to educate the villages to the west about the planning process, especially Pt. Hope and Pt Lay. You should attend village council meetings and do so more than once over the next year or so.		
Consultation	You also need to involve the people of Kotzebue and surrounding area.		
Cultural sites	There area many more cultural sites in the Utukok area and elsewhere in the South NPR-A		
	than in other areas of the Petroleum Reserve.		
Economic benefits - mining	Would hardrock development in the South add to the economic tax base of the North Slope Borough because the Borough owns lands in the area of potential development?		
Impacts from	As oil and gas development moves further west, away from TAPS, it becomes more likely		
development	that the oil/gas will be taken to the coast and exported. Transportation of equipment and ore		
	related to hardrock development could also be to the coast and over ocean routes. This could affect bowhead whales – these impacts need to be addressed in the analysis.		
Cumulative	Since the Prudhoe Bay discovery 35 years ago, expansion of development on the North Slope		
impacts	has resulted in growing impacts on hunters as they are pushed out of more and more of their traditional hunting grounds. Now even Pt Lay and Wainwright will be affected.		
Special Areas	All of the Kasegaluk Lagoon (not just the portion in NPR-A) should be a Special Area; Pt.		
-	Hope, Pt. Lay and Wainwright all depend on the resources in the Kasegaluk Lagoon.		
	Protection of this area from the impacts of development would be critical to those		
	communities.		
No development	Even though there may be an economic benefit to the Borough if the South NPR-A was		
	opened to hard-rock mineral development I prefer the status quo.		
Subsistence	There may be only 10 Native allotments in the Planning Area but many local people use the		
	area for subsistence - this is a very important traditional land use area.		

Topic/Resource	Comment
Impacts to whales	Don't transport ore, equipment, materials, etc.; west to the Chukchi Sea, this could disrupt
•	whale migration – STAY OUT OF OUR OCEAN!
Consultation	Need to bring tribal leaders from all affected communities together in one place at the same
	time so BLM can better understand the extent of potential impacts to the Native people.
Impacts from	North Slope Borough's position has been to support developments on land where oil spills
spills	can be contained; concern about ability to contain spills in lagoons and near shore coastal
	areas.
Consultation	Need to get the perspective of native people not white experts on Native people to understand
	the impacts.
W&SR	Opposed to the designation of any rivers under the Wild and Scenic Rivers Act.
Subsistence	Concerned about the people of Anaktuvuk Pass due to their dependence on movement of
	caribou that any development in South and associated roads/pipelines to the Dalton Highway
	could disrupt caribou movement through Anaktuvuk and other nearby passes.
Local hire	Very few local residents are being hired to work in existing fields, need to hire locals.
Data collection	The Federal government has a responsibility to fund the North Slope Borough Wildlife
	Department to conduct studies on wildlife that may be impacted by development. The U.S.
	should be contributing millions to research on wildlife. This funding should not reduce
	impact funding going to local communities.
Impact funds	Impact funds should be given directly to affected area not given to the State for distribution.
Impact funds	Pt. Lay doesn't have city government and tribe cannot apply for impact funds through State,
	we need to be able to by-pass State.
Local ordinances	Each village should have wildlife ordinances to manage sport hunters.
Cooperative	ANILCA gave rural preference for subsistence resources. Does this apply to NPR-A - if it
Management	doesn't ANILCA should be amended. Rural preference provisions of ANILCA should be
-	implemented and there should be cooperative management of wildlife resources. Federal
	funds should be provided to pay for Native cooperation.
Transportation	The Governor has been on TV discussing a railroad through the NANA region that would
	connect Siberia to Alaska. Has the State approached BLM about this proposal?
Data collection	Now is a great time for BLM to get serious about collecting baseline data on wildlife,
	fisheries and subsistence uses in the area or provide funds for us and the villages to do the
	work. Our funds are declining and we cannot keep the staff needed to do this. Federal
	government is not providing the grant money it used to.
Public safety	BLM should provide Borough with funding for polar bear patrols; this is a real threat along
	coastal areas. An individual was killed in Pt. Lay by a polar bear.
Data collection	Where oil is discovered we and BLM need to work together to conduct baseline wildlife
	studies and use that information to lessen impacts.
Impact funds	BLM needs to take a position and support us in having impact funds come directly to us, not
	the State. The way impact funds are distributed needs to be changed.
Impacts to caribou	(BLM) Helicopter activity near our camp this summer scared away the caribou. Helicopters
	are loud, do they really have to be used?
Public safety	Near Skull Cliff there is a crane sunken ion the ocean with the tip of the crane showing above
	water; this is a hazard to boat traffic.
Public safety	Helicopter was probably related to restoration and closure of DEW line sites, crane could be
	from a BIA cat train that went through ice in late 50's.
Atqasuk 9/15/05	
Oil and gas	Atqasuk needs natural gas. Need to develop a way natural gas can be produced and used in
development	Atqasuk; prefer production of natural gas to production of coal.
Subsistence	Lot of people hunt in the south Planning Area.
Impacts to caribou	Watch for the feeding grounds of the caribou, a lot of activity there could impact the caribou.
Impacts to caribou	Don't do anything to change the natural movement of the caribou.
Subsistence	We rely on the caribou and the fish in the rivers.
Protect rivers	The Nushaguktovik River is the river we are most concerned with (Note; this river is NW of
	Atqasuk and not in the Planning Area).
	<u> </u>

Topic/Resource	Comment
Protect rivers	The Meade River is and an important resource for us and of real concern.
Impacts to water	BLM needs to be aware of runoff and drainage patterns. Especially important in winter with
•	water movement under the ice. Also spring runoff under the snow. Need to be careful to
	prevent pollution and not to change drainage patterns.
Subsistence	An impact to the Western Arctic Caribou Herd would heavily impact Wainwright and other
impacts	communities; caribou move along coast and through Wainwright all winter long.
Impacts to caribou	Caribou movement patterns are already being altered by activities even in the summer,
•	particularly aircraft.
Oil and gas	We would like to see natural gas provided to Atqasuk either by pipeline or portable
development	containers.
Planning/Process	If we disagree with the plan, will you still go forward?
Impacts from	If oil is found will it mean a road and the impacts that go with it? We don't want another
access	haul road in our area.
Protect rivers	The most important thing is to take care of rivers!
Anaktuvuk Pass 9/	16/05
Allaktuvuk Fass 9/	10/05
Impacts from coal	If coal is developed what are the health risks to workers? What would be the impacts on the
mining	plants and animals that we eat and on us from eating them? What measures would be taken to
	protect plants and animals and us?
Studies to mitigate	If there is mining, is BLM going to fund studies and monitoring plans to assure the health and
impacts	well being of the caribou?
Impacts from	Caribou hunted in Anaktuvuk Pass come from the South Planning Area; mining must not
mining	adversely impact the caribou calving area.
Impacts from	If a road was built to the Dalton, this could have many adverse impacts to Anaktuvuk Pass as
access	hunters from outside the area would have access to our traditional use areas and the road
	could be a barrier to caribou migration. A road might also improve our access.
Impacts from	Have you done any studies on the effects of the Red Dog Mine on caribou? Dynamiting
mining, more	while mining/exploring for lead/zinc etc., results in air and water pollution that affects the
studies	caribou. We eat these caribou and depend on them. Our health is affected by mining affects
	on caribou. We see many caribou that are diseased. BLM needs to study these diseases and
	find out what is causing it.
Impacts from	There is no way to mine the ground without releasing contaminants to the environment.
mining	Whatever happens you need to take measures that eliminate or significantly reduce the air
	and water borne contaminants that can effect the health of caribou and people.
Do more studies	Give it more time; you should wait until you know more about the impacts of mining on
	caribou BLM needs to do more to understand the causes of cancer in people and poor health
D 1:	in caribou.
Don't mine	Why is BLM planning for an area where caribou calve, you shouldn't develop any minerals
G 7	in this area.
Caribou	Our main concern is the protection of caribou.